

RCRA Subtitle I Inspection Report

UST Compliance Inspection

PEPCO Energy Services, Inc.
Buzzard Point Generating Station
1st and V Street SW
Washington, DC 20024

Facility Telephone Number: (202) 388-2521

Date of Inspection: October 1, 2012

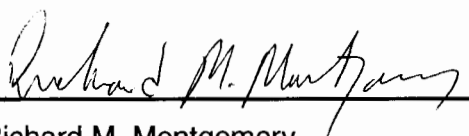
Facility Identification Number: 2000609


Facility Location: 38.867604, -77.011768 (approximate)

EPA Representative: Richard Montgomery (Contractor)
Avanti Corporation
(703) 916-1660
richard@avanticorporation.com

Tanks Owner: Pepco Energy Services Inc.
1300 N. 17th Street
Suite 1600
Arlington, VA 22209

Tanks Owner Representative: Michael Williams
Power Plant Asset Manager
(703) 253-1787


Richard M. Montgomery


10/22/2012
Date

1.0 BACKGROUND

On October 1, 2012, the United States Environmental Protection Agency (EPA), Region 3, Office of Enforcement, RCRA Compliance and Enforcement Branch, represented by its contractor, Richard Montgomery, of Avanti Corporation, conducted a Compliance Evaluation Inspection (CEI) of the Pepco Buzzard Point Generating Station, located in the Buzzard Point area of Washington, D.C., to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA).

2.0 INSPECTION PROCEDURES

Mr. Montgomery contacted the Tank Owner Representative on September 29, 2012, to provide notification of the inspection schedule. Mr. Montgomery conducted the inspection on October 1, 2012. Upon arrival at the station, Mr. Montgomery was met by the Power Plant Asset Manager for Pepco Services Inc., Mr. Michael Williams and other Pepco and contract personnel. Mr. Montgomery completed the Region 3 Underground Storage Tank (UST) compliance checklist, which is included as Attachment 1 to this report.

3.0 TANK DESCRIPTIONS

The facility operates two 4,000-gallon USTs used to store an oily water mixture released from false starts by station generators (See Table 1). According to the facility's District of Columbia Department of the Environment (DDOE) notification (submitted December 22, 2009) both tanks were installed in September 1993 and are double-walled composite of steel and Fiberglass-Reinforced Plastic (FRP). Pepco personnel stated the tanks no longer receive fuel flow and the substance stored in the USTs is an oily water mixture. The fluid in the tanks is removed via vacuum on an as need basis and was last emptied on June 22, 2012 (Attachment 2).

According to the DDOE notification, diesel is delivered via gravity feed through coated/wrapped piping which is cathodically protected. Pepco personnel stated the piping is steel coated, and supplies the oily water mixture to the tanks. Pepco personnel stated the diesel supply to the Combustion Turbines (CT) had been disconnected in mid-August, and as a result any flow to the USTs would be rainwater entering through the CT's exhaust stacks. During the inspection, the inspector was unable to observe the transfer piping.

Table 1**Facility Underground Storage Tanks and Piping Data**

| | Tank 1 (009) East | Tank 2 (010) West |
|----------------------------|---------------------------------------|---------------------------------------|
| <i>Capacity</i> | 4000 gallons | 4000 gallons |
| <i>Installation Date</i> | September 1993 | September 1993 |
| <i>Tanks Construction</i> | DW Composite (Steel with FRP) | DW Composite (Steel with FRP) |
| <i>Piping Construction</i> | Steel Coated with Cathodic Protection | Steel Coated with Cathodic Protection |
| <i>Contents</i> | Oily Water Mixture | Oily Water Mixture |

DW – Double-Walled

FRP – Fiberglass reinforced plastic

(###) – DDOE notification Tanks ID number

Facility representatives opened all lids during the inspection. A diagram of the lid configuration is provided as part of the Region 3 UST Compliance Checklist (Attachment 1) and a photograph of the lids is provided in the photo log (Attachment 3).

The District of Columbia tank registrations provided to the inspector are valid through December 31, 2012.

4.0 TANKS RELEASE DETECTION

Releases from the tanks are detected by two Veeder Root (VR) TLS 350 monitoring systems. These VR systems continuously monitor for any moisture present in the annular space of the tanks. The alarm status is an on/off alarm reading and appears on the VR systems located in waterproof boxes next to the tank areas. The alarm status also is remotely delivered via a Robertshaw Centeron® system to a Pepco office. At the time of the inspection the VR consoles indicated all functions normal. Attachment 4 contains the inspection/maintenance records for the VR systems completed on November 11, 2011 by K&G Petroleum Systems. Tank tightness test records indicated the last tests were performed in December 2000 by Petro Supply, Inc. Monthly records for the interstitial alarms indicated an Off scenario (no leak) for the tanks from June 2011 through June 2012. Remote delivery for Tank 2 was interrupted in September, October and November 2011 and caused manual readings to be taken. Attachment 5 contains passing records of monthly interstitial alarm status and the last tank tightness tests for both tanks.

5.0 PIPING RELEASE DETECTION

No piping release detection is conducted. The gravity feed flow is to the tanks and is intermittent; only after a false start at the CT or during precipitation events. Pepco personnel stated while the diesel feed to the CT has been disconnected, piping from the CT to the USTs is still intact.

6.0 SPILL/OVERFILL PREVENTION

The VR systems monitor tank levels and audible and electronic alarms are used to prevent overfill. The inspector did observe external alarms, but could not check their status because there was no test button.

7.0 CATHODIC PROTECTION

Cathodic protection is provided to the steel piping via a galvanic sacrificial anode system. Two cathode protection system tests were conducted by Piping and Corrosion Specialties, Inc. on January 15, 2003 and May 11, 2009. Pepco personnel stated a cathode protection system test was conducted in 2006, but could not produce the records. The latest test conducted on May 11, 2009 indicated the two piping runs did not meet the -0.85V criterion. Corrective action of anode replacement was completed on July 15, 2009 by Piping and Corrosion Specialties, Inc. Attachment 6 provides copies of the 2009 and 2003 initial reports as well as the 2009 corrective action.

8.0 FINANCIAL RESPONSIBILITY

This facility is insured through Associated Electric & Gas Insurance Services Limited policy number XL5038401P, which expires on October 31, 2012. The policy is written to Pepco Holdings, Inc. with an address of Washington, DC 20068 (Attachment 7).

9.0 USED OIL

Used oil storage tanks were not identified as part of this inspection.

10.0 OTHER USTs

The inspector did not observe any other USTs at the facility.

ATTACHMENTS

1. Region 3 UST Compliance Checklist
2. Manifest for UST Non-Hazardous Shipment
3. Photo Log
4. VR System Inspection and Maintenance Records
5. Interstitial Alarm Status and Tank Tightness Tests
6. Cathodic Protection Reports
7. Proof of Financial Responsibility
8. Inspection Conclusion Data Sheet

Attachment 1

Region 3 UST Compliance Checklist

Facility ID Number 2000609

Leak Detection Inspection Checklist

I. Ownership of Tank(s)

Pecco Energy Services Inc.
1300 N 17th Street Suite 1600
Arlington, VA 22209

II. Location of Tank(s)

Buzzard Point Generating Station
1st and V Streets SW
Washington DC 20024
Number of Tanks at This Location: 2

III. Tank Information

Complete for each tank. If facility has more than 4 tanks, photocopy page and complete information for additional tanks.

| Tank presently in use (circle) | ^{East} Tank 1 = 009 | ^{West} Tank 2 = 010 | Tank 3 | Tank 4 |
|--|---------------------------------|---------------------------------|--------|--------|
| If not, date last used | ^{from} July 2012 | ^{from} July 2012 | | |
| If emptied, verify 1" or less of product in tank | June | June | | |
| Month and Year Tank Installed | Sept 1993 | Sept 1993 | | |
| Material of Construction tank/pipe | DW steel FRP/ steel wrapped | DW steel FRP/ steel wrapped | | |
| Capacity of Tank (in gallons) | 4000 | 4000 | | |
| Substance Stored | Oil/Water Mix | Oil/Water Mix | | |

IV.A. Release Detection For Tanks required.

Check the release detection method(s) used for each tank or N/A if none required.

| | | | | |
|---|---------|---------|--|--|
| Manual Tank Gauging (tanks under 1,000 gal.) | N/A | N/A | | |
| Manual Tank Gauging and Tank Tightness Testing (tanks under 2,000 gal.) | ↓ | ↓ | | |
| Tank Tightness Testing and Inventory Control | ↓ | ↓ | | |
| Automatic Tank Gauging | ↓ | ↓ | | |
| Vapor, Groundwater or <u>Interstitial Monitoring</u> | IM only | IM only | | |
| Other approved method (SIR) | N/A | N/A | | |

IV.B. Release Detection For Piping

Check the release detection method(s) used for piping.

| | | | | |
|---|--------------|--------------|--|--|
| Check Pressurized (P) or Suction (S) Piping for each tank | gravity feed | gravity feed | | |
| Automatic Line Leak Detectors, <u>and</u> check one | N/A | N/A | | |
| Vapor or Groundwater Monitoring | ↓ | ↓ | | |
| Secondary Containment with Monitoring | ↓ | ↓ | | |
| Line Tightness Testing | ↓ | ↓ | | |

I Richard Montgomery certify that I have inspected the above named facility on 10/1/2012
(print name) month/day/year

Inspector's Signature: Richard Montgomery Date: 10/02/2012

Facility ID Number 2000609

Leak Detection for Piping

Pressurized Piping

A method must be selected from each set. Where applicable indicate date of last test. If this facility has more than 4 tanks, please photocopy this page and complete information for all additional piping.

| Set 1 | Tank 1 | Tank 2 | Tank 3 | Tank 4 |
|---|--------|--------|--------|--------|
| Automatic Flow Restrictor | | | | |
| Automatic Shut-off Device | | | | |
| Continuous Alarm System | | | | |
| and | | | | |
| Set 2 | | | | |
| Annual Line Tightness Testing | | | | |
| Interstitial Monitoring | | | | |
| If Interstitial Monitoring, documentation of monthly monitoring is available | | | | |
| Ground-Water or Vapor Monitoring | | | | |
| If Ground-Water or Vapor Monitoring, documentation of monthly monitoring is available | | | | |
| Other Approved Method (specify in comments section) | | | | |

Suction Piping.

Indicate date of most recent test.

| Line Tightness Testing (required every 3 years) | | | | |
|---|--|--|--|--|
| Secondary Containment with Interstitial Monitoring | | | | |
| Ground-Water or Vapor Monitoring | | | | |
| Other Approved Method (specify in comments section) | | | | |
| No Leak Detection Required (must answer yes to all of the following questions) | | | | |
| Operates at less than atmospheric pressure | | | | |
| Has only one check valve, which is located directly under pump | | | | |
| Slope of piping allows product to drain back into tank when suction released | | | | |
| All above information on suction piping is verifiable | | | | |

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: Piping is gravity feed from generator after a false start. As per Pepeco personal delivery lines to generators where cut Mid-August -

Inspector's Signature: Rachel Montgomery

Date: 10/2/2012

Facility ID Number 2000609

Inventory Control and Tank Tightness Testing

Method of tank tightness testing: Petro-Tite Testing System

Address of tank tightness tester: Petro Supply 8677 Cherry Lane, Laurel MD 20707

Please complete all information for each tank

If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

| | Tank 1 | Tank 2 | Tank 3 | Tank 4 |
|--|------------|------------|--------|--------|
| Date of last tank tightness test. | 12/18/2000 | 12/18/2000 | | |
| Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what actions have been taken (e.g., has state been notified?) | yes | yes | | |
| Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available. | NA | NA | | |
| Overages or shortages are less than 1% + 130 gals of tank's flow-through volume. | ↓ | ↓ | | |
| If no, which months were not? | | | | |

Please answer yes or no for each question

| | | |
|---|-----|----|
| Owner/operator can explain inventory control methods and figures used and recorded. | Yes | No |
| Records include monthly water monitoring. | Yes | No |
| Tank inventory reconciled before and after fuel delivery. | Yes | No |
| Books are reconciled monthly. | Yes | No |
| Appropriate calibration chart is used for calculating volume. | Yes | No |
| Dispenser pumps are calibrated to within 6 cubic inches per five gallons. | Yes | No |
| The drop tube in the fill pipe extends to within one foot of tank bottom. | Yes | No |
| Owner can demonstrate consistency in dipsticking techniques. | Yes | No |
| The dipstick is long enough to reach the bottom of the tank. | Yes | No |
| The ends of the gauge stick are flat and not worn down. | Yes | No |
| The dipstick is marked legibly & the product level can be determined to the nearest 1/8th inch. | Yes | No |
| The tank has been tested within the year & has passed the tightness test (if necessary). | Yes | No |
| A third-party certification of the tank tightness test method is available. | Yes | No |
| Tank tester complied with all certification requirements. | Yes | No |
| Monitoring and testing are maintained and available for the past 12 months. | Yes | No |

Comments:

Inspector's Signature:

Richard Montgomery

Date:

10/2/2012

Vapor Monitoring

Name of monitoring device: _____

Date system installed _____ Number of monitoring wells _____

Distance of monitoring well(s) from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by: _____

Location of site assessment documentation: _____

Please indicate yes or no for each tank Please complete all information for each tank. If facility has more than 4 tanks, please photocopy this page and complete the information for additional tanks.

| | Tank 1 | Tank 2 | Tank 3 | Tank 4 |
|---|--------|--------|--------|--------|
| Well is clearly marked and secured. | | | | |
| Well caps are tight. | | | | |
| Well is constructed so that monitoring device is not rendered inoperative by moisture or other interferences. | | | | |
| Well is free of debris or has other indications that it has been recently checked. | | | | |

Please answer yes or no for each question

| | | | |
|---|-----|----|--|
| UST excavation zone was assessed prior to vapor monitoring system installation. | Yes | No | |
| One or more USTs is/are included in system. | Yes | No | |

If the system is automatic, check the following:

| | | | |
|--|-----|----|--|
| Power box is accessible and power light is on. | Yes | No | |
| Documentation of monthly readings is available for last 12 months. | Yes | No | |
| Equipment used to take readings is accessible and functional. | Yes | No | |
| Vapor monitoring equipment has been calibrated within the last year. | Yes | No | |

If the system is manual, check the following:

| | | | |
|--|-----|----|--|
| Documentation of monthly readings is available for last 12 months. | Yes | No | |
| Equipment used to take readings is accessible and functional. | Yes | No | |
| Vapor monitoring equipment has been calibrated within the last year. | Yes | No | |
| Porous material was used for backfill. | Yes | No | |
| Wells are placed within the excavation zone. | Yes | No | |
| Level of background contamination is known. If so -- what is level? | Yes | No | |

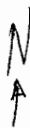
On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____

Inspector's Signature: Robert Montgomery Date: 10/02/2012

Facility ID Number 2000609

Site Sketch/Photo Log



Concrete/Brick Wall

Veeder-Root
Remote Sensor
Alarm

Vacuum
Port

Manway
High Level
Sensor

Tank #2

Manway
High Level
Sensor

Vacuum
Port

Veeder-Root
Remote Sensor
Alarm

Inspector's Signature:

Rachel Montoya

Date:

10/02/2012

Facility ID Number 2000609

Manual Tank Gauging

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank tightness testing for tanks of up to 2,000 gal.

Please indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tanks 1 & 4): _____

Please answer yes or no for each question

Records show liquid level measurements are taken at beginning and end of period of at least ([Circle one] 36, 44, 58) hours during which no liquid is added to or removed from the tank.

Yes

No

Level measurements are based on average of two consecutive stick readings at both beginning and end of period.

Yes

No

Monthly average of variation between beginning and end measurements is less than standard shown below for corresponding size and dimensions of tank and waiting time.

Yes

No

Gauge stick is long enough to reach bottom of the tank. Ends of gauge stick are flat and not worn down.

Yes

No

Gauge stick is marked legibly and product level can be determined to the nearest one-eighth of an inch.

Yes

No

MTG is used as sole method of leak detection for tank.

Yes

No

MTG is used in conjunction with tank tightness testing.

Yes

No

Are all tanks for which MTG is used under 2,000 gallons in capacity?

Yes

No

Are monitoring records available for the last 12 month period?

Yes

No

Check One:

**Nominal Tank Capacity
(in gallons)**

Tank Dimensions

**Monthly Standard
(in gallons)**

Minimum Test Duration

()

110-550

N/A

5

36 hours

()

551 - 1,000*

N/A

7

36 hours

()

1,000*

64" diameter x 73" length

4

44 hours

()

1,000*

48" diameter x 128" length

6

58 hours

()

1,001 - 2,000*

N/A

13

36 hours

* Manual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal.

Comments: _____

Inspector's Signature: _____

Date: 10/02/2012

Facility ID Number 2000609

Ground Water Monitoring

Date System Installed: _____
 Distance of well from tank(s) (1) _____ (2) _____ (3) _____ (4) _____
 Distance of well from piping (1) _____ (2) _____ (3) _____ (4) _____
 Site assessment was conducted by: _____
 Location of site assessment documentation: _____

Please answer each question of each well

If there are more than 4 wells, please photocopy this page and complete the information for all additional wells.

| | Well 1 | Well 2 | Well 3 | Well 4 |
|--|--------|--------|--------|--------|
| Well is clearly marked and secured to avoid unauthorized access or tampering. | | | | |
| Well was opened and presence of water was observed in well at depth of _____ ft. | | | | |

Please answer yes or no for each question

| | | |
|--|-----|----|
| Wells are used to monitor piping. | Yes | No |
| Site assessment was performed prior to installation of wells. | Yes | No |
| Documentation of monthly readings is available. | Yes | No |
| Specific gravity of product is less than one. | Yes | No |
| Hydraulic conductivity of soil between UST system and monitoring wells is not less than 0.01 cm/sec. According to: _____ | Yes | No |
| Groundwater is not more than 20 feet from ground surface. | Yes | No |
| Wells are sealed from the ground surface to top of filter pack. | Yes | No |
| Continuous monitoring device or manual bailing method used can detect the presence of at least one-eighth of an inch of the product on top of groundwater in well. | Yes | No |
| Groundwater is monitored: () Manually on a monthly basis. () Automatically (continuously or monthly basis [Circle one]). | | |
| Check the following if groundwater is monitored <u>manually</u> : Bailer used is accessible and functional. | Yes | No |
| Check the following if groundwater is monitored <u>automatically</u> : Monitoring box is operational. | Yes | No |
| Checked for presence of sensor in monitoring well. | Yes | No |

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: _____
 Inspector's Signature: Ricardo Martinez Date: 10/02/2012

Facility ID Number 2000609

Interstitial Monitoring

Manufacturer and name of system: Veedar Root TLS 350
 Date system installed: August 2008
 Materials used for secondary barrier: FRP
 Materials used for internal lining: Steel
 Interstitial space is monitored (Circle one): continuously, monthly basis.

Please answer yes or no for each question

| | | | |
|--|---------------------------------------|-------------------------------------|--------------------------------------|
| All tanks in system are fitted with secondary containment and interstitial monitoring. | <input checked="" type="radio"/> Yes | <input type="radio"/> No | N/A |
| System is designed to detect release from any portion of UST system that routinely contains product. | Yes | <input checked="" type="radio"/> No | N/A |
| Monitoring method is documented as capable of detecting a leak as small as .1 gal./hr. with at least a 95% probability of detection and a probability of false alarm of no more than 5%. | Yes <i>No documentation</i> | <input checked="" type="radio"/> No | N/A |
| Documentation of monthly readings is available for last 12 months. | <input checked="" type="radio"/> Yes* | <input type="radio"/> No | N/A |
| Maintenance and calibration documents and records are available and indicate appropriate maintenance procedures for system have been implemented. | <input checked="" type="radio"/> Yes | <input type="radio"/> No | N/A |
| Monitoring box, if present, is operational. | <input checked="" type="radio"/> Yes | <input type="radio"/> No | N/A |
| If monitoring wells are part of leak detection system, monitoring wells are clearly marked and secured to avoid unauthorized access and tampering. | Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |
| Interstitial space is monitored manually on monthly basis (answer the following question). | Yes | <input checked="" type="radio"/> No | N/A |
| Equipment used to take readings is accessible and functional. | Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |
| Tank is double-walled | <input checked="" type="radio"/> Yes | <input type="radio"/> No | N/A |
| Tank is fitted with internal bladder to achieve secondary containment (answer the following question). | Yes | <input checked="" type="radio"/> No | N/A |
| Bladder is compatible with substance stored and will not deteriorate in the presence of that substance. | Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |
| Excavation is lined with impervious artificial material to achieve secondary containment (answer the following questions). | Yes | <input checked="" type="radio"/> No | N/A |
| Secondary barrier is always above groundwater. | Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |
| If secondary barrier is not always above groundwater, secondary barrier and monitoring designs are for use under such conditions. | Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |
| Secondary barrier is constructed from artificially constructed material, with permeability to substance $< 10^6$ cm/sec. | Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |
| Secondary barrier is compatible with the regulated substances stored and will not deteriorate in presence of that substance. | Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |
| Secondary barrier does not interfere with operation of cathodic protection system. | Yes | <input type="radio"/> No | <input checked="" type="radio"/> N/A |

Comments: * Manual readings for Sept-Nov 2011 for Tank 2

Inspector's Signature: R. L. Montgomery

Date: 10/02/2012

Facility ID Number 2000609

Automatic Tank Gauging

Manufacturer, name and model number of system: Weeder Root TLS 350 *

Please answer yes or no for each question

| | | |
|--|-----|----|
| Device documentation is available at site (e.g., manufacturer's brochures, owner's manual). | Yes | No |
| Device can measure height of product to nearest one-eighth of an inch. | Yes | No |
| Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch. | Yes | No |
| Documentation is available that the ATG was in test mode a minimum of once a month. | Yes | No |
| Checked for presence of gauge in tanks. | Yes | No |
| Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation). | Yes | No |
| Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods"). | Yes | No |
| Checked documentation that system was installed, calibrated, and maintained according to manufacturer's instructions. | Yes | No |
| Maintenance records are available upon request. | Yes | No |
| Monthly testing records are available for the past 12 months. | Yes | No |
| Daily monitoring records are available for the past 12 months (if applicable). | Yes | No |

Comments: * Only measures high-low for removal purposes

Inspector's Signature: Rick Montgomery

Date: 10/02/2012

Facility ID Number 2000609

Statistical Inventory Reconciliation

Please complete all information for each tank If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.

Please answer yes or no for each question

Records include monthly water monitoring.

Yes

No

Tank inventory reconciled before and after fuel delivery.

Yes

No

Appropriate calibration chart is used for calculating volume.

Yes

No

Dispenser pumps are calibrated to within 6 cubic inches per five gallons.

Yes

No

The drop tube in the fill pipe extends to within one foot of tank bottom.

Yes

No

Answer one of the following three:

1) Owner can demonstrate consistency in dipsticking techniques.

Yes

No

a) The dipstick is long enough to reach the bottom of the tank.

Yes

No

b) The end of the gauge stick is flat and not worn down.

Yes

No

c) The dipstick is legible & the product level can be determined to the nearest 1/8th inch.

Yes

No

OR

2) Automatic tank gauge is used for readings.

Yes

No

OR

3) Other method is used for readings (explain in comment section below).

Yes

No

A third-party certification of the SIR method is available.

Yes

No

Monitoring and testing records are maintained and available for the past 12 months.

Yes

No

Comments: _____

Inspector's Signature: Rachel Montgomery

Date: 10/02/2012

Facility ID Number 2000609

| Spill/Overfill Prevention | | | | |
|---|------------------------|------------------------|-----------|-----------|
| | Tank 1 | Tank 2 | Tank 3 | Tank 4 |
| Are all tank transfers less than 25 gallons? | Yes or <u>No</u> | Yes or <u>No</u> | Yes or No | Yes or No |
| Spill Prevention | | | | |
| Is there a spill bucket (at least 5 gallons) or another device that will prevent release of product to the environment (such as a dry disconnect coupling)? | Yes or No <u>NA</u> | Yes or No <u>NA</u> | Yes or No | Yes or No |
| Overfill Prevention | | | | |
| What device is used to prevent tank from being overfilled? | | | | |
| Ball float valve | Yes or <u>No</u> | Yes or <u>No</u> | Yes or No | Yes or No |
| Butterfly valve (in fill pipe) | Yes or <u>No</u> | Yes or <u>No</u> | Yes or No | Yes or No |
| Automatic alarm monitoring is used | <u>Yes</u> or No | <u>Yes</u> or No | Yes or No | Yes or No |
| Other alarm system _____ | Yes or <u>No</u> | Yes or <u>No</u> | Yes or No | Yes or No |

DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MECHANISM? YES ☒ NO ☐ (PROVIDE COMMENTS AS TO COMPLIANCE STATUS FOR 40 C.F.R. PART 280 SUBPART H.)

| Cathodic Protection | | | | |
|---|--|--|-----------|-----------|
| | Tank 1 | Tank 2 | Tank 3 | Tank 4 |
| Sacrificial Anode System | | | | |
| Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)? | <u>See Comment A</u> Yes or <u>No</u> | <u>See Comment A</u> Yes or <u>No</u> | Yes or No | Yes or No |
| The last two test results are available. (Tests are required every three years.) | <u>See Comment B</u> Yes or <u>No</u> | <u>See Comment B</u> Yes or <u>No</u> | Yes or No | Yes or No |
| Impressed Current | | | | |
| Rectifier is on 24 hours a day? | Yes or No | Yes or No | Yes or No | Yes or No |
| The last two test results are available? (Tests are required every 60 days.) | Yes or No | Yes or No | Yes or No | Yes or No |
| Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)? | Yes or No | Yes or No | Yes or No | Yes or No |
| Comments: <u>A) Two reports with two results 5/2009 tests indicated not in compliance 08/2003 tests indicate compliance B) Test Results from 2003 & 2009 - no 2006 results</u> Inspector's Signature: <u>Richard Montoya</u> Date: <u>10/02/2012</u> | | | | |

Attachment 2

Manifest for UST Non-Hazardous Shipment

GENERATOR

TRANSPORTER

FACILITY

Non-Hazardous Shipping Document

1. Generator's US EPA ID No.

Manifest Doc. No.

2. Page 1
of

3. Generator's Name and Mailing Address

4. Generator's Phone ()

5. Transporter 1 Company Name

6. US EPA ID Number

A. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

B. Transporter's Phone

9. Designated FCC Environmental LLC Facility

10. US EPA ID Number

C. Facility's Phone

- ☐ 6305 East Lombard Street Baltimore, Maryland 21224
- ☐ 5501 Courtney Avenue Alexandria, Virginia 22304
- ☐ 2353 Lanier Road Rockville, Virginia 23146
- ☐ 2115 Speedrail Court Concord, North Carolina 28025
- ☐ 505 South Market Street Wilmington, Delaware 19801
- ☐

EPA # MDD985389816

EPA # VAD980537302

EPA # VAD988222998

EPA # NCR000003319

EPA # DED984073692

410-633-0606

703-370-8124

804-749-8361

704-455-6863

302-421-9306

11. Shipping Name and Description

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

a.

b.

D. Additional Descriptions for Materials Listed Above

E. Handling Codes for Materials Listed Above

15. Special Handling Instructions and Additional Information

16. This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. I certify that the material removed from the above premises is not hazardous waste as identified in 40 CFR Part 261, and does not contain PCB's as identified in 40 CFR Part 761. The generator will be responsible for any and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the generator.

Printed/Typed Name

Signature

Month

Day

Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month

Day

Year

CUSTOMER CONTACT

PHONE NUMBER

SITE NUMBER NAME AND ADDRESS

NUMBER

PAGE OF

CALL TYPE PROBLEM CODE ORDER ORIGIN

PRIORITY

P.O. NUMBER

CALL WAS TAKEN ON AT BY

ROUTE

ASSIGNED TECH

PROBLEM SYNOPSIS, AS REPORTED

M/A NUMBER

PROMISE DATE TIME

| VEHICLE NO. | TRAILER NO. | UPTIME UNIT NO. | TT | TM | ST | ARRIVE DATE | ARRIVE TIME | CLOSE DATE | CLOSE TIME | JOB COMPLETE |
|---------------------|-------------|-----------------|-----|----------|----|-----------------------|-------------|------------|-----------------------|-----------------------------|
| | | | 7 | | | 6/20/11 | 8:30 | 6/22 | | YES NO |
| PART / DESCRIPTION | | | U/M | QUANTITY | HM | SHIPPING DESCRIPTION | | | SERIAL # GLYCOL pH | # CONT BRK SNIFFER C-D-T |
| Transfer of Solvent | | | | | | New 4 gal. Qty. Waste | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |

Reuse Qualification Statement

By signing this document, I hereby certify that I understand the used FCC Environmental, LLC degreasing fluid (i.e. Mineral spirits, petroleum naphtha) returned to FCC Environmental, LLC for inclusion in the FCC Environmental, LLC Reuse Program will be utilized as an effective substitute for chemical product. For the purpose of qualifying to participate in the Program, I further certify that any used degreasing fluid so returned to FCC Environmental, LLC has not been mixed with hazardous waste or other objectionable substances.

All constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use of the solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational procedures and based on this review do hereby make this true, accurate and complete certification.

Reuse Solvent QA & QC

| | | |
|--|--|--------------------|
| Yes <input type="checkbox"/> | No <input type="checkbox"/> | Rep Initials _____ |
| <input type="checkbox"/> Used solvent passed visual inspection | <input type="checkbox"/> Light assembly is in good working order | |
| <input type="checkbox"/> Used solvent has no unusual odor | <input type="checkbox"/> Lid is unobstructed | |
| <input type="checkbox"/> Parts Cleaner is clean (front/back) | <input type="checkbox"/> Parts Cleaner is properly grounded | |
| <input type="checkbox"/> Fusible link operational | | |

Authorization Signature

I agree to pay for the above services and/or products and to be bound by the terms and conditions set forth above and on the reverse side of this document.

Initial if Conditionally Exempt Small Quantity Generator as defined in 40 CFR 261.5

Initial if Do-it-yourself collection center

Generator

EPA ID#

The GENERATOR hereby certifies that the material collected from the GENERATOR'S facility by FCC Environmental, LLC does not contain any PCBs defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261. In the note collected is a used oil as defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm or the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for pay and all or including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste. I certify to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOR.

Shipping Declaration:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Transporter Information:

FCC Environmental, LLC
523 N. Sam Houston Parkway East, Suite 400 Houston, TX 77060
US DOT ID#: 1688621
EPA ID#: TXR000070094

Designated Facility

6305 E. Lombard Street
Baltimore, MD 21224
(888) 749-8344
EPA ID#: MDD085389816

EMERGENCY CONTACT CHEMTREC (800) 424-9300

PRINT CUSTOMER NAME

CUSTOMER SIGNATURE / DATE

DRIVER SIGNATURE / DATE

RECEIVED AT PLANT / DATE

1211803

CUSTOMER

Attachment 3

Photo Log



Photo 1

Site Overview: Location of Tank #1(East)

Date Taken: October 1, 2012

Taken By: R. Montgomery



Photo 2

Site Overview: Location of Tank #2 (West)

Date Taken: October 1, 2012

Taken By: R. Montgomery



Photo 3

View of Manway with Centeron® Remote Sender

Date Taken: October 1, 2012

Taken By: R. Montgomery

Attachment 4

VR System Inspection and Maintenance Records

K & G Petroleum Services, Inc.








P.O. Box 134 Saint Leonard, MD. 20685
Phone 410-495-8100 ♦ Fax 410-495-7888

| | |
|---------------|--|
| Site | NAES Buzzard Point East False Start Drain UST |
| Date | 11/16/11 |
| Address | First and V St. S.W. Washington, D.C. 20024 |
| Tech. Cert. # | A24421 |
| Unit Model# | TLS 350 |

System Periodic Maintenance Checklist

Veeder-Root environmental monitoring systems installed in accordance with installation manual requirements are designed to detect and report conditions that inhibit proper operation. Veeder-Root systems self-diagnose components, and if a component failure is detected, will not complete and report tank and line tests. They system will issue an audible and visual alarm when a failed or disconnected sensor is detected.

The Periodic Maintenance Checklist, if followed, may extend the life of the system, but is not required for proper operation.

|  WARNING | |
|---|---|
|     | Attempting to service tank monitors and equipment without proper training can be dangerous. |
| | Fire or explosion or electrical shock resulting in seriously injury or death could result. |
| | Read and follow all safety warnings. If you have not been trained in proper service procedures and hazards involved, refer all service to a qualified Veeder-Root Service Representative. |
| | |

| Maintenance Operation | When to Perform | What to Do | ✓ |
|-----------------------|---------------------|--|---|
| Console | Yearly | <ol style="list-style-type: none"> 1. Check printer for paper if equipped. 2. Print out check system inventory and verify to actual inventory. 3. Print out or record system setup values, then verify if battery backup is working by powering the unit down and then back up with the circuit breaker. If programming is lost, the battery is bad and the unit needs services. 4. Verify in-tank tests are being performed as required by printing reports. 5. Press Alarm/Test button to verify power, warning and alarm indicators light and audible alarm sounds. 6. Verify line leak tests are being performed (if line leak installed). | <p>N/A</p> <p>N/A</p> <p>PASS</p> <p>N/A</p> <p>PASS</p> <p>N/A</p> |
| Mag Probes | Yearly ¹ | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect probe cables for any cracking or swelling. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Replace probe cables (ref. item 1). 2. Verify epoxy kits have been installed on field wiring. 3. Mag probes only-Inspect floats and probes shaft for any residue build up. Clean with mineral spirits as necessary. <p>¹Mag Probes used in products such as waste oil should be checked more frequently than yearly since products of this type can leave deposits on the probe shaft and float assemblies that may restrict the probe's measurement capability.</p> | N/A |

| Maintenance Operation | When to Perform | What to Do | ✓ |
|---------------------------------|-----------------|--|-----|
| VVLD | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. During or immediately after running a 3.0 gph (11.3 lph) self test, visually inspect fuel lines for leakage. 2. Check flexible fuel control lines for any chafing or excessive corrosion. Service Contractor <ol style="list-style-type: none"> 1. Replace check valve filters (Diesel products only) per VVLD Troubleshooting Manual No. 576013-849. 2. Verify epoxy kits have been installed on field wiring. | N/A |
| PLLD | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. Check submersible pump head for leakage at PLLD port and functional element with pump ON. 2. Check Line Leak transducer cable for any cracking or damage. Service Contractor <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace cable if cracked or damaged (ref. item 2). | N/A |
| WPLLD | Yearly | Owner or Station Attendant Check submersible pump head for leakage at WPLLD port and functional element with pump ON. | N/A |
| Piping Sump Sensor (float type) | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. Inspect sensors to verify float moves freely. 2. Turn sensor upside down to verify the monitor liquid alarm is activated. Service Contractor <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. | N/A |

| Maintenance Operation | When to Perform | What to Do | ✓ |
|------------------------------|------------------------|---|----------|
| Dispenser Pan Sensor | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. 2. Verify sensor is firmly secured in an upright position on the bottom of the pan. Service Contractor <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace sensor if cables are cracked or damaged (ref. item 1). | N/A |
| Containment Sump Sensor | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. 2. Verify sensor is firmly secured in an upright position on the bottom of the containment sump. Service Contractor <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace sensor if cables are cracked or damaged (ref. item 1). | N/A |
| Interstitial Sensor (Tank) | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. Service Contractor <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace sensor if cables are cracked or damaged (ref. item 1). | PASS |

| Maintenance Operation | When to Perform | What to Do | ✓ |
|----------------------------|-----------------|---|-----|
| Groundwater Sensor | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. 2. Lift sensor above water level in the well and verify the system activates a "WATER OUT" alarm. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace sensor if cables are cracked or damaged (ref. item 1). 3. If the sensor does not alarm (ref. item 2), replace the sensor. | N/A |
| Hydrostatic Sensor (Brine) | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Remove sensor from brine reservoir and verify floats move freely. With sensor in its upright position, the system should activate a "FUEL ALARM". Turn the sensor upside down to be sure the system activates a "WATER ALARM". If the sensor does not alarm in both conditions, replace the sensor. 2. Verify epoxy kits have been installed on field wiring. 3. Replace sensor if cables are cracked or damaged (ref. item 1). | N/A |
| Mag Sensor | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Replace Mag Sensor cable (ref. item 1). 2. Verify epoxy kits have been installed on field wiring. | N/A |

K & G Petroleum Services, Inc.



P.O. Box 134 Saint Leonard, MD. 20685
Phone 410-495-8100 ♦ Fax 410-495-7888

| | |
|---------------|--|
| Site | NAES Buzzard Point West False Start Drain UST |
| Date | 11/16/11 |
| Address | First and V St. S.W. Washington, D.C. 20024 |
| Tech. Cert. # | A24421 |
| Unit Model# | TLS 350 |

System Periodic Maintenance Checklist

Veeder-Root environmental monitoring systems installed in accordance with installation manual requirements are designed to detect and report conditions that inhibit proper operation. Veeder-Root systems self-diagnose components, and if a component failure is detected, will not complete and report tank and line tests. They system will issue an audible and visual alarm when a failed or disconnected sensor is detected.

The Periodic Maintenance Checklist, if followed, may extend the life of the system, but is not required for proper operation.



WARNING



Attempting to service tank monitors and equipment without proper training can be dangerous.

Fire or explosion or electrical shock resulting in seriously injury or death could result.

Read and follow all safety warnings. If you have not been trained in proper service procedures and hazards involved, refer all service to a qualified Veeder-Root Service Representative.

| Maintenance Operation | When to Perform | What to Do | ✓ |
|-----------------------|---------------------|--|---|
| Console | Yearly | <ol style="list-style-type: none"> 1. Check printer for paper if equipped. 2. Print out check system inventory and verify to actual inventory. 3. Print out or record system setup values, then verify if battery backup is working by powering the unit down and then back up with the circuit breaker. If programming is lost, the battery is bad and the unit needs services. 4. Verify in-tank tests are being performed as required by printing reports. 5. Press Alarm/Test button to verify power, warning and alarm indicators light and audible alarm sounds. 6. Verify line leak tests are being performed (if line leak installed). | <p>N/A</p> <p>N/A</p> <p>PASS</p> <p>N/A</p> <p>PASS</p> <p>N/A</p> |
| Mag Probes | Yearly ¹ | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect probe cables for any cracking or swelling. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Replace probe cables (ref. item 1). 2. Verify epoxy kits have been installed on field wiring. 3. Mag probes only-Inspect floats and probes shaft for any residue build up. Clean with mineral spirits as necessary. <p>¹Mag Probes used in products such as waste oil should be checked more frequently than yearly since products of this type can leave deposits on the probe shaft and float assemblies that may restrict the probe's measurement capability.</p> | N/A |

| Maintenance Operation | When to Perform | What to Do | ✓ |
|---------------------------------|------------------------|--|----------|
| VVLD | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. During or immediately after running a 3.0 gph (11.3 lph) self test, visually inspect fuel lines for leakage. 2. Check flexible fuel control lines for any chafing or excessive corrosion. Service Contractor <ol style="list-style-type: none"> 1. Replace check valve filters (Diesel products only) per VVLD Troubleshooting Manual No. 576013-849. 2. Verify epoxy kits have been installed on field wiring. | N/A |
| PLLD | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. Check submersible pump head for leakage at PLLD port and functional element with pump ON. 2. Check Line Leak transducer cable for any cracking or damage. Service Contractor <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace cable if cracked or damaged (ref. item 2). | N/A |
| WPLLD | Yearly | Owner or Station Attendant Check submersible pump head for leakage at WPLLD port and functional element with pump ON. | N/A |
| Piping Sump Sensor (float type) | Yearly | Owner or Station Attendant <ol style="list-style-type: none"> 1. Inspect sensors to verify float moves freely. 2. Turn sensor upside down to verify the monitor liquid alarm is activated. Service Contractor <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. | N/A |

| Maintenance Operation | When to Perform | What to Do | ✓ |
|----------------------------|-----------------|---|------|
| Dispenser Pan Sensor | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. 2. Verify sensor is firmly secured in an upright position on the bottom of the pan. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace sensor if cables are cracked or damaged (ref. item 1). | N/A |
| Containment Sump Sensor | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. 2. Verify sensor is firmly secured in an upright position on the bottom of the containment sump. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace sensor if cables are cracked or damaged (ref. item 1). | N/A |
| Interstitial Sensor (Tank) | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace sensor if cables are cracked or damaged (ref. item 1). | PASS |

| Maintenance Operation | When to Perform | What to Do | ✓ |
|------------------------------|------------------------|---|----------|
| Groundwater Sensor | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. 2. Lift sensor above water level in the well and verify the system activates a "WATER OUT" alarm. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Verify epoxy kits have been installed on field wiring. 2. Replace sensor if cables are cracked or damaged (ref. item 1). 3. If the sensor does not alarm (ref. item 2), replace the sensor. | N/A |
| Hydrostatic Sensor (Brine) | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Remove sensor from brine reservoir and verify floats move freely. With sensor in its upright position, the system should activate a "FUEL ALARM". Turn the sensor upside down to be sure the system activates a "WATER ALARM". If the sensor does not alarm in both conditions, replace the sensor. 2. Verify epoxy kits have been installed on field wiring. 3. Replace sensor if cables are cracked or damaged (ref. item 1). | N/A |
| Mag Sensor | Yearly | <p>Owner or Station Attendant</p> <ol style="list-style-type: none"> 1. Inspect sensor cables for any cracking or swelling. <p>Service Contractor</p> <ol style="list-style-type: none"> 1. Replace Mag Sensor cable (ref. item 1). 2. Verify epoxy kits have been installed on field wiring. | N/A |

Attachment 5

Interstitial Alarm Status and Tank Tightness Tests

E. Interstitial Alar

Information **History**

Setup

Current View:

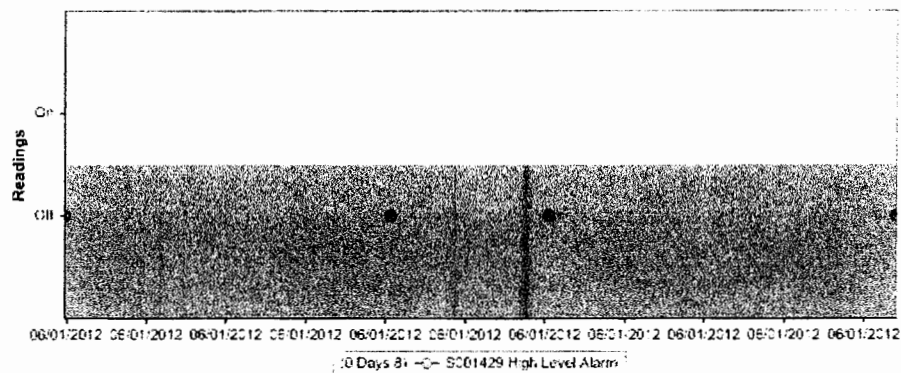
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 6/1/2012 to 6/1/2012 Refresh

Sensors: ☒ High Level Alarm Show Data In: Chart



E. Interstitial Alar

Information History

Setup

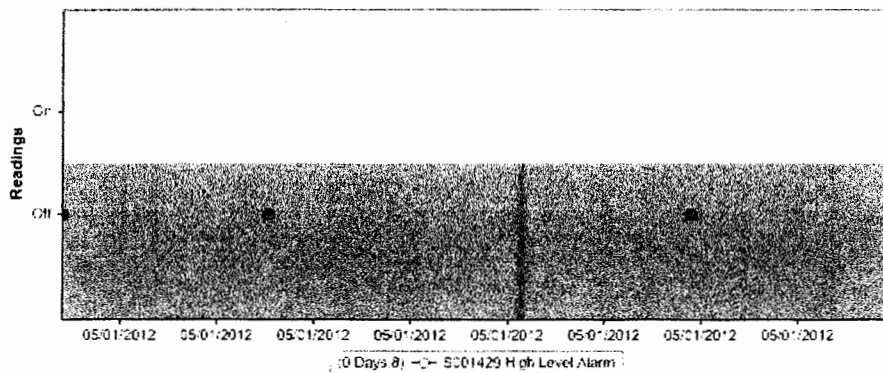
Current View:

Information

- Switch
- Alerts
- Maintenance

History

| | | | |
|-------|-----------------------------------|--|----------------|
| Days: | Date Range: | Sensors: | Show |
| 0 | From 5/1/2012 to 5/1/2012 Refresh | <input checked="" type="checkbox"/> High Level Alarm | Data In: Chart |



E. Interstitial Alar

Information History

Setup

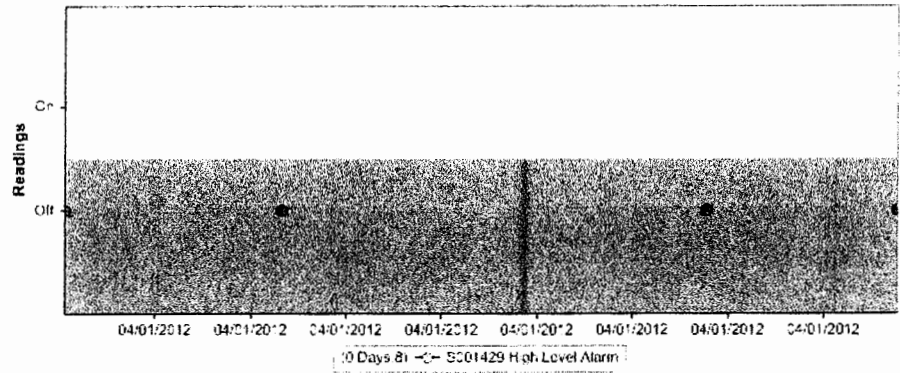
Current View:

Information

- Switch
- Alerts
- Maintenance

History

| | | | |
|-------|-----------------------------------|--|----------------|
| Days: | Date Range: | Sensors: | Show |
| 0 | From 4/1/2012 to 4/1/2012 Refresh | <input checked="" type="checkbox"/> High Level Alarm | Data In: Chart |



E. Interstitial Alar

Information History

Setup

Current View:

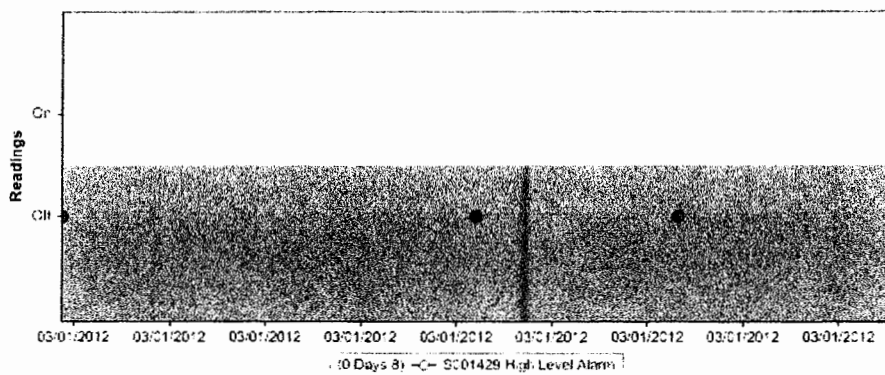
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 3/1/2012 to 3/1/2012 Refresh

Sensors: ☒ High Level Alarm Show Data In: Chart



E. Interstitial Alar

Information History

Setup

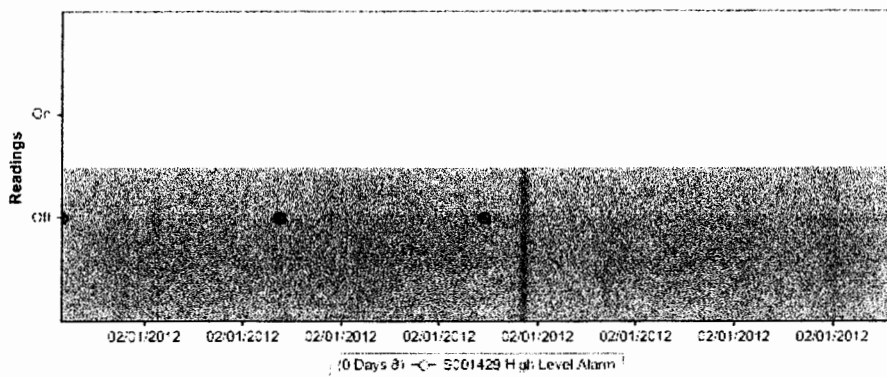
Current View:
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 2/1/2012 to 2/1/2012 Refresh

Sensors: ☒ High Level Alarm Show Data In: Chart



i Information **History**

Setup

Current View:

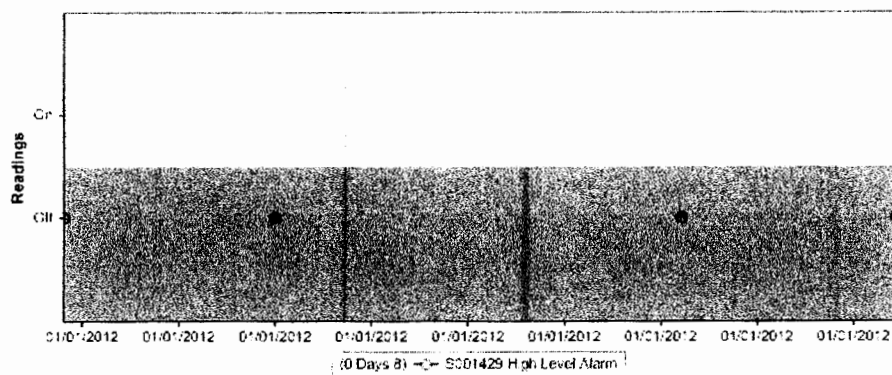
Information

- **Switch**
- **Alerts**
- **Maintenance**

History

Days: 0 Date Range: From 1/1/2012 to 1/1/2012 Refresh

Sensors:
☒ High
Level
Alarm



E. Interstitial Alar

Information History

Setup

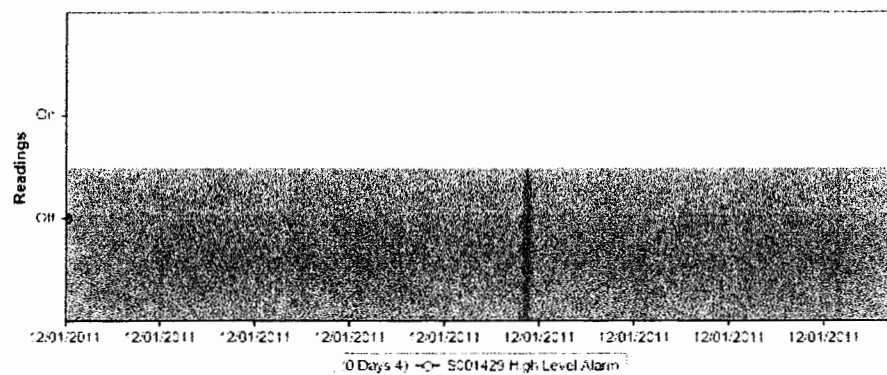
Current View:

Information

- Switch
- Alerts
- Maintenance

History

| | | | | | |
|-------|-------------|-----------|----------|-----------|----------|
| Days: | Date Range: | | Sensors: | | Show |
| 0 | From | 12/1/2011 | to | 12/1/2011 | High |
| | | | | | Level |
| | | | | | Alarm |
| | | | | | Data In: |
| | | | | | Chart |



E. Interstitial Alar

Information **History**

Setup

Current View:

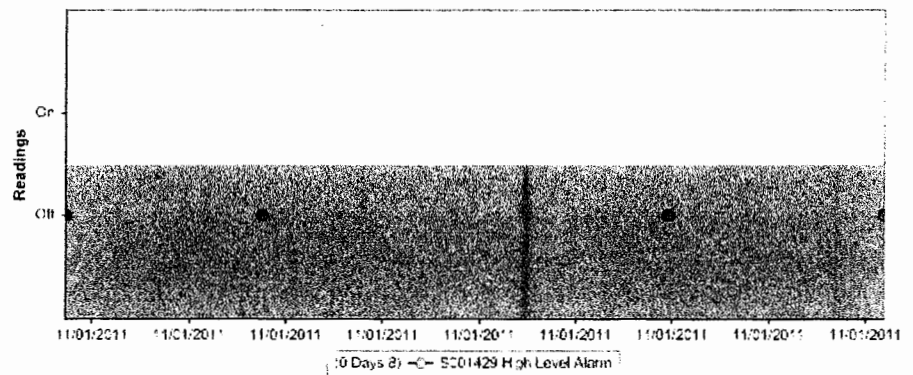
Information

- **Switch**
- **Alerts**
- **Maintenance**

History

Days: Date Range: From to [Refresh](#)

Sensors:
☒ High
Level
Alarm



E. Interstitial Alar

Information History

Setup

Current View:

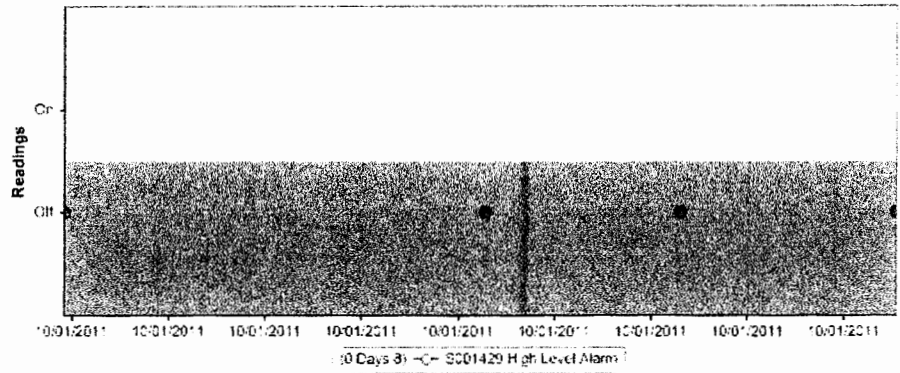
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 10/1/2011 to 10/1/2011 Refresh

Sensors: ☒ High Level Alarm Show Data In: Chart



E. Interstitial Alar

Information History

Setup

Current View:

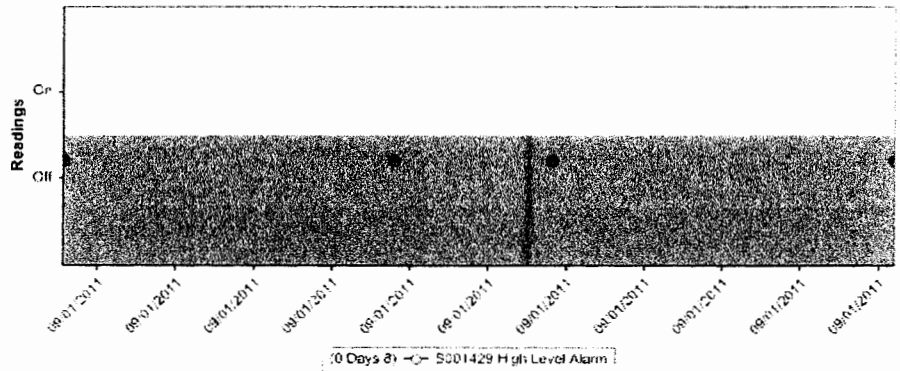
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 9/1/2011 to 9/1/2011 Refresh

Sensors: Show
☒ High Level Alarm
 Data In: Chart



E. Interstitial Alar

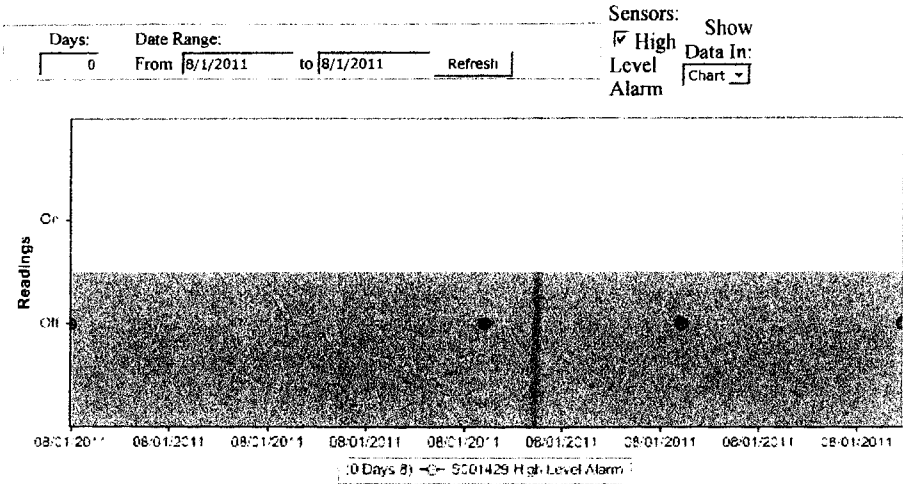
Information History

Setup

Current View:
Information

- Switch
- Alerts
- Maintenance

History



E. Interstitial Alar

Information History

Setup

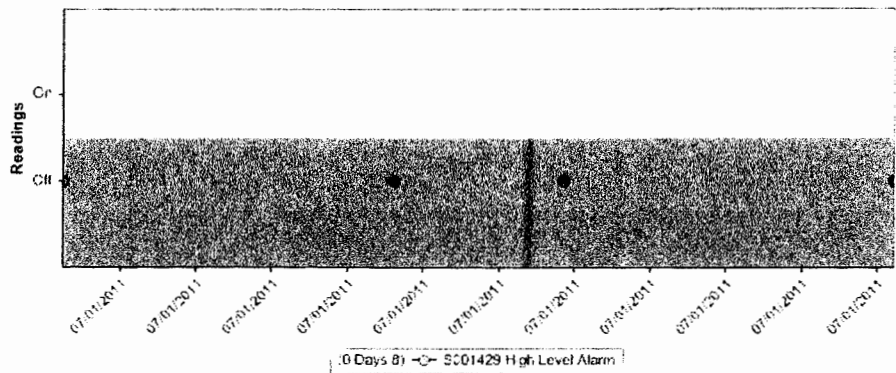
Current View:

Information

- Switch
- Alerts
- Maintenance

History

| | | | |
|---------|---------------------------|--|----------------|
| Days: | Date Range: | Sensors: | Show |
| 0 | From 7/1/2011 to 7/1/2011 | <input checked="" type="checkbox"/> High Level Alarm | Data In: Chart |
| Refresh | | | |



E. Interstitial Alar

Information **History**

Setup

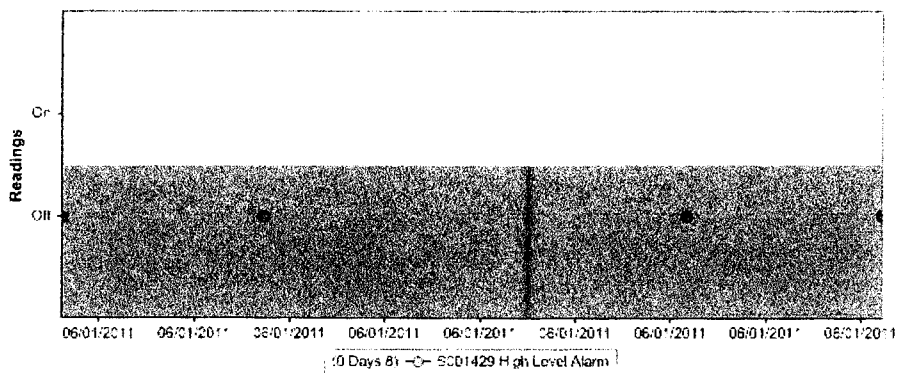
Current View:

Information

- Switch
- Alerts
- Maintenance

History

| | | | |
|-------|-----------------------------------|--|----------------|
| Days: | Date Range: | Sensors: | Show |
| 0 | From 6/1/2011 to 6/1/2011 Refresh | <input checked="" type="checkbox"/> High Level Alarm | Data In: Chart |



0 Da, 5.81 → 5004.50 High Level Alarm

W. Interstitial Alar

Information **History**

Setup

Current View:

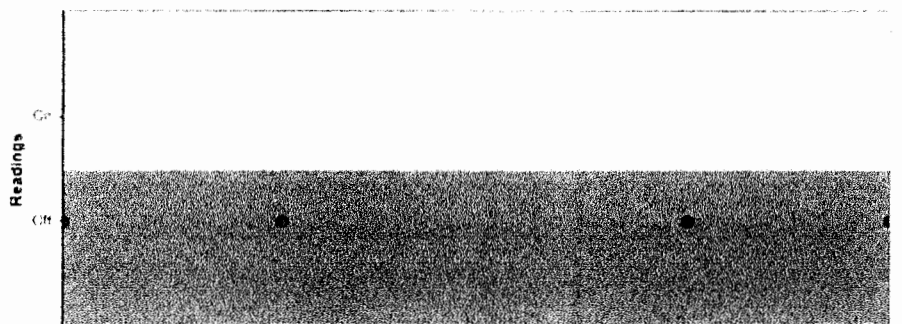
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 5/1/2012 to 5/1/2012 Refresh

Sensors: ☒ High Level Alarm Show Data In: Chart



05-01-2012 05-01-2012 05-01-2012 05-01-2012 05-01-2012 05-01-2012 05-01-2012 05-01-2012

(0 Days 8) - 6001430 High Level Alarm

W. Interstitial Alar

Information **History**

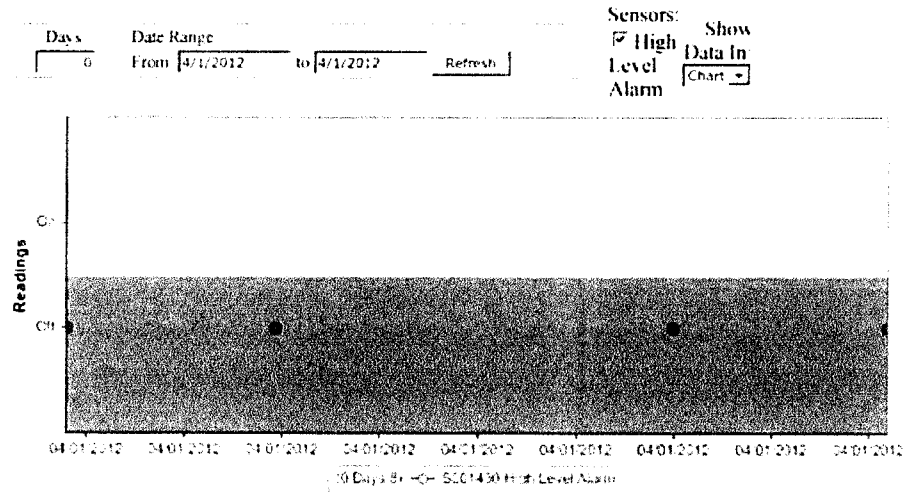
Setup

Current View:

Information

- Switch
- Alerts
- Maintenance

History



W. Interstitial Alar

Information

History

Setup

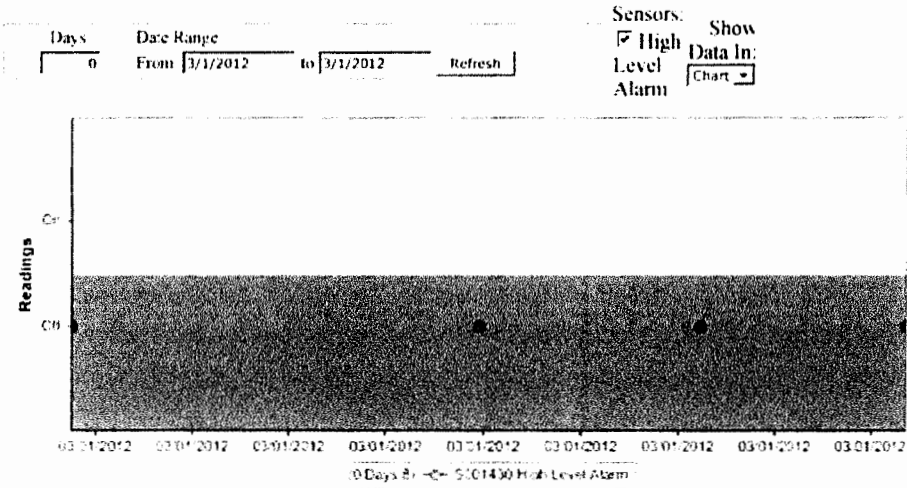
History

Switch

Alerts

Maintenance

Current View:
Information



W. Interstitial Alar

Information ~ History

Setup

Current View:

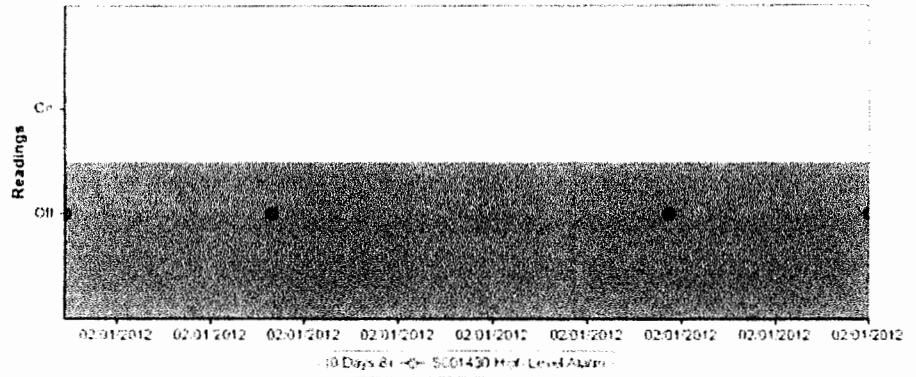
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 2/1/2012 to 2/1/2012 Refresh

Sensors: ☒ High Level Alarm Show Data In Chart



W. Interstitial Alar

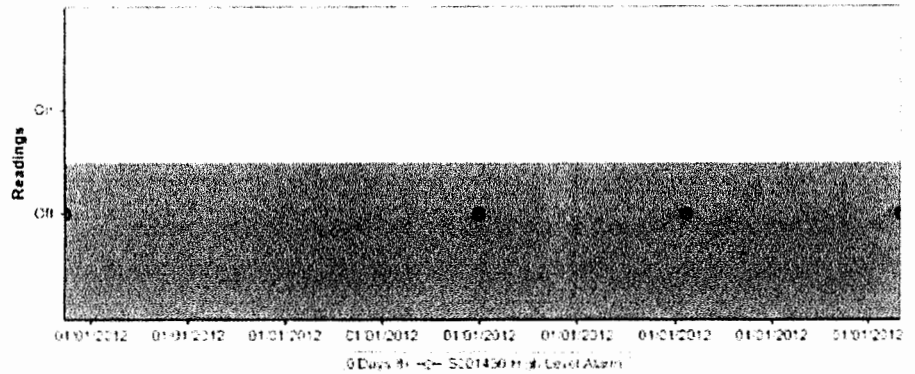
Information **History**
Setup

Current View:
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 1/1/2012 to 1/1/2012 Refresh
Sensors: ☒ High Level Alarm Show Data In Chart



W. Interstitial Alar

Information **History**

Setup

Current View:

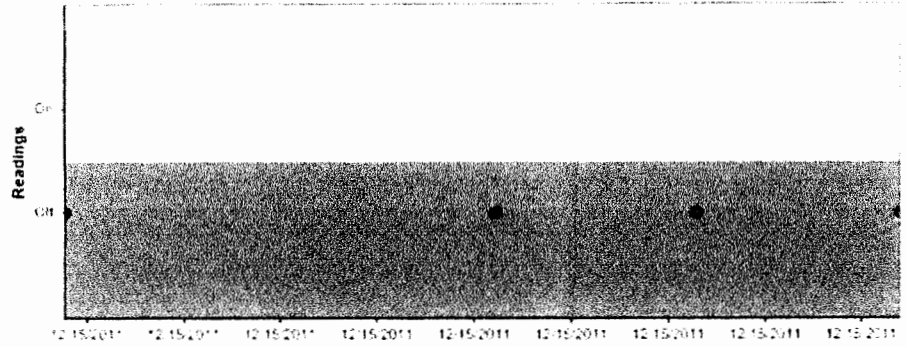
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 12/15/2011 to 12/15/2011 Refresh

Sensors: ☒ High Level Alarm Show Data In: Chart



W. Interstitial Alar

Information History

Setup

- Switch
- Alerts
- Maintenance

History

Current View:

Information

Days: 0 Date Range: From 11/1/2011 to 11/1/2011 Refresh

Sensors: Show
☒ High Level Alarm
 Data In: Chart

No Data

W. Interstitial Alar

Information History
Setup

Current View:
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 10/1/2011 to 10/1/2011 Refresh

Sensors: Show
☒ High Data In:
Level Alarm Chart

No Data

W. Interstitial Alar

Information History

Setup

- Switch
- Alerts
- Maintenance

History

Current View:

Information

Days: 0 Date Range: From 9/1/2011 to 9/1/2011 Refresh

Sensors: Show
☒ High Level Alarm
 Data In. Chart

No Data

W. Interstitial Alar

Information **History**

Setup

Current View:

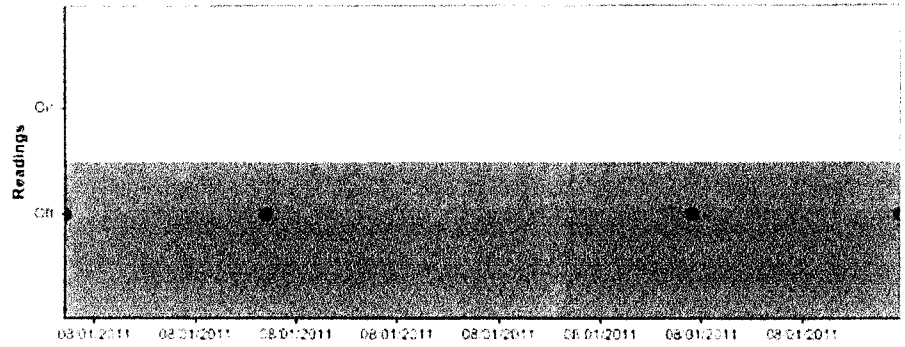
Information

- Switch
- Alerts
- Maintenance

History

Days: Due Range: From to

Sensors: ☒ High Level Alarm



W. Interstitial Alar

Information History

Setup

Current View:

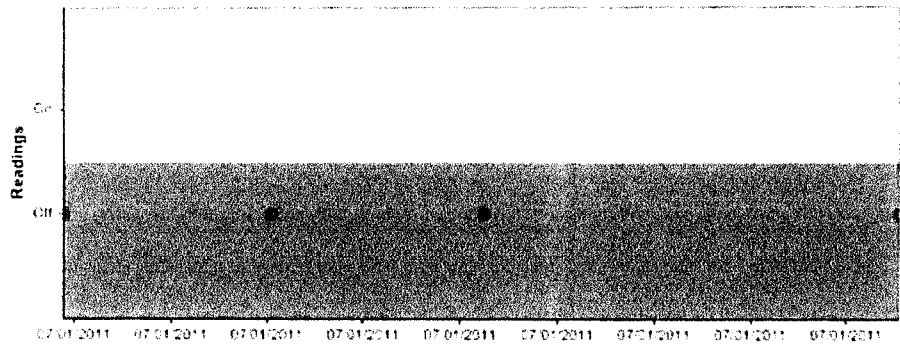
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 7/1/2011 to 7/1/2011 Refresh

Sensors: ☒ High Level Alarm Show Data In: Chart



W. Interstitial Alar

Information History

Setup

Current View:

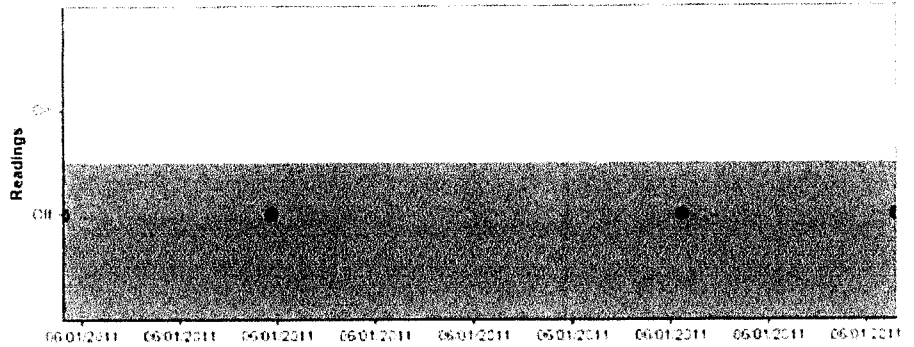
Information

- Switch
- Alerts
- Maintenance

History

Days: 0 Date Range: From 6/1/2011 to 6/1/2011 Refresh

Sensors: Show
☒ High Level Alarm Data In.
 Chart



Buzzard Point

COMBUSTION TURBINE ROUNDS

Date: Sept. 19, 2011

Tuesday

OPERATOR: L. Freeman

EAST BLOCK STATION SERVICE

E-1-A 3803

E-5-8 7221

Emerg. 0754

WEST BLOCK STATION SERVICE

W-1-A 4137

W-5-8 5431

Emerg. 0154

Gas Turbines

Air Compressors/Fuel Oil Houses Transformer Leak Inspection

E-1-A OK E-1-A OK

E-5-8 OK E-1-A OK

W-1-A OK W-1-A OK

W-5-8 OK W-5-8 OK

| | |
|--------------|-----------|
| OK | |
| 1. East Bank | <u>OK</u> |
| 2. West Bank | <u>OK</u> |
| 3. Spare | <u>OK</u> |

TLS 350 MONITORING

GREEN East West

YELLOW

RED

* NOTIFY SUPERVISOR

Fuel Tank Level/Temp

East 25'7" / 70

West 25'6" / 70

Cathodic Protection

VOLTS 6 HOURS 21447

AMPS 2.5

Fuel Tank/Containment

East OK West OK

CATCH BASIN FUEL YARD

1-Rel. Side OK

2-unload OK

3-East Side OK

Fire Valve Closed and Locked

YES ✓ NO

FALSE START DRAIN TANKS

EAST LEVEL 11"

WEST LEVEL 2"

CATCH BASIN TURBINE YARD

1-East ✓ (green light on)

2-West ✓ (green light on)

Drain off 2/11/11

Buzzard Point

COMBUSTION TURBINE ROUNDS

Date: OCT 17 2011

OPERATOR: MAJOR

MONDAY

EAST BLOCK STATION SERVICE

E-1-4 3861

E-5-8 7268

Emerg. 754

WEST BLOCK STATION SERVICE

W-1-4 4172

W-5-8 5485

Emerg. 154

Gas Turbines

Air Compressors/Fuel Oil Houses

E-1-4 SLIGHT E-1-4 ok

E-5-8 ok E-1-4 ok

W-1-4 ok W-1-4 ok

W-5-8 ok W-5-8 ok

Transformer Leak Inspection

OK

1. East Bank ok

2. West Bank ok

3. Spare ok

TLS 350 MONITORING

GREEN East West

YELLOW

RED

* NOTIFY SUPERVISOR

Fuel Tank Level/Temp

East 25' 2" / 68°

West 25' 2" / 67°

Cathodic Protection

VOLTS 1.8 HOURS 22217

AMPS 2.2

Fuel Tank/Containment

East ok West ok

Fire Valve Closed and Locked

YES ✓ NO

CATCH BASIN FUEL YARD

1-Rt Side ok

2-unload ok

3-East Side ok

FALSE START DRAIN TANKS

EAST LEVEL 15"

WEST LEVEL 75"

CATCH BASIN TURBINE YARD

1-East ✓ (green light on)

2-West ✓ (green light on)

Buzzard Point

COMBUSTION TURBINE ROUNDS

Date: 11-17-11

OPERATOR: BRENNAN

THURSDAY

EAST BLOCK STATION SERVICE

E-1-4 3922

E-5-8 7325

Emerg. 754

WEST BLOCK STATION SERVICE

W-1-4 4208

W-5-8 5544 2

Emerg. 15-

Gas Turbines

Air Compressors/Fuel Oil Houses

E-1-4 OK E-1-4 OK

E-5-8 OK E-1-4 OK

W-1-4 OK W-1-4 OK

W-5-8 OK W-5-8 OK

Transformer Leak Inspection

- OK
1. East Bank ✓
 2. West Bank ✓
 3. Spare ✓

TLS 350 MONITORING

GREEN ✓ East ✓ West

YELLOW

RED

* NOTIFY SUPERVISOR

Fuel Tank Level/Temp

East 25 1/2 / 540

West 25 1/2 / 530

Cathodic Protection

VOLTS 16 HOURS 22961

AMPS 2.0

Fuel Tank/Containment

East OK West OK

CATCH BASIN FUEL YARD

1-RE Side OK

2-unload OK

3-East Side OK

Fire Valve Closed and Locked

YES ✓ NO

FALSE START DRAIN TANKS

EAST LEVEL 16

WEST LEVEL 6 1/2

CATCH BASIN TURBINE YARD

1-East ✓ (green light on)

2-West ✓ (green light on)

Data Chart for Tank System Tightness Test

petro-tite
TANK TESTER

Petro Supply, Inc.

8677 Cherry Lane, Laurel, MD 20707

(301) 953-3540

P PRINT

| 1. OWNER Property <input type="checkbox"/> Tank(s) <input type="checkbox"/> | Pepco 2nd & Kat S.W. Washington D.C. Name Address Representative Telephone Name Address Representative Telephone | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|--|--|---------------------------------|--------------------------|---|---------------------|-------|-------------------|-------------|-----------|-------|--------------|----------|-----------|-------|--------------|----------|--|--|--|--|--|--|--|--|
| 2. OPERATOR | Pepco Name Address Telephone | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3. REASON FOR TEST (Explain Fully) | Regulatory | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4. WHO REQUESTED TEST AND WHEN | Mike Riley Name Title Company or Affiliation Date Address Telephone | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5. TANK INVOLVED Use additional lines for manifolded tanks | Identify by Direction East Side West Side | Capacity 4000 4000 | Brand/Supplier | Grade Water Water | Approx. Age | Steel/Fiberglass Steel Steel | | | | | | | | | | | | | | | | | | | | |
| 6. INSTALLATION DATA | Location North inside driveway, Rear of station, etc | Cover Concrete Concrete, Black Top, Earth, etc | Fills 4" Size, Titefill make, Drop tubes, Remote Fills | Vents 2" Size, Manifolded | Siphones Which tanks? | Pumps Suction, Remote, Make if known | | | | | | | | | | | | | | | | | | | | |
| 7. UNDERGROUND WATER | Depth to the Water table <u>N/A</u> Is the water over the tank? <input type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8. FILL-UP ARRANGEMENTS | Tanks to be filled _____ hr _____ Date Arranged by _____ Name Telephone Extra product in "top off" and run tank tester How and who to provide? Consider NO lead <u>full upon arrival</u> Terminal or other contact for notice or inquiry _____ Company Name Telephone | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9. CONTRACTOR, MECHANICS, any other contractor involved | Petro Supply, Inc. | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10. OTHER INFORMATION OR REMARKS | Tanks are double wall steel | | | | | | | | | | | | | | | | | | | | | | | | | |
| 11. TEST RESULTS | Tests were made on the above tank systems in accordance with test procedures prescribed for as detailed on attached test charts with results as follows: <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th>Tank Identification</th> <th>Tight</th> <th>Leakage Indicated</th> <th>Date Tested</th> </tr> </thead> <tbody> <tr> <td>East Side</td> <td>tight</td> <td>-0.001 G.P.H</td> <td>12/11/00</td> </tr> <tr> <td>West Side</td> <td>tight</td> <td>+0.012 G.P.H</td> <td>12/18/00</td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | | | | | | Tank Identification | Tight | Leakage Indicated | Date Tested | East Side | tight | -0.001 G.P.H | 12/11/00 | West Side | tight | +0.012 G.P.H | 12/18/00 | | | | | | | | |
| Tank Identification | Tight | Leakage Indicated | Date Tested | | | | | | | | | | | | | | | | | | | | | | | |
| East Side | tight | -0.001 G.P.H | 12/11/00 | | | | | | | | | | | | | | | | | | | | | | | |
| West Side | tight | +0.012 G.P.H | 12/18/00 | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 12. SENSOR CERTIFICATION Date _____ Serial No. of Thermal Sensor _____ | NOTE: Petro Supply, Inc. represents that the Precision Test was performed in accordance with applicable laws, regulations and procedures for Precision Testing using the Petro-Tite Testing System. Petro Supply, Inc. makes no representations regarding the condition of the subject tank, or the existence or non-existence of any leakage from the subject tank. Owner is hereby advised that it may wish to obtain or request a retesting of the subject tank, with the consent of appropriate regulatory authorities, prior to taking any action with respect to the tank. | | | | | | | | | | | | | | | | | | | | | | | | | |

14. Repro 2nd & 1st S.W. "Washing" N.C. 12/11/1
 Name of Supplier, Owner or Dealer Address No. and Street(s) City State Date of Test

15. TANK TO TEST

Tank #1 East Side
 Identity by position
Water
 Brand and Grade

15a. BRIEF DIAGRAM OF TANK FIELD

16. CAPACITY

Nominal Capacity 4000 Gallons
 By most accurate capacity chart available 4000 Gallons

From
☐ Station Chart
☐ Tank Manufacturer's Chart
☐ Company Engineering Data
☐ Charts supplied with
☐ Other

17. FILL-UP FOR TEST

Stick Water Bottom before Fill-up full of water to 64" Gallons

64" in.
 Tank Diameter

Inventory

4000
Top off

Gallons

4000

40

4040

Transfer total to line 25a

Total Gallons as Reading

18. SPECIAL CONDITIONS AND PROCEDURES TO TEST THIS TANK

☐ Water in tank ☐ Line(s) being tested with LVLLT
☐ High water table in tank excavation

See manual sections applicable. Check below and record procedure in log (27).

Use maximum allowable test pressure for all tests
 Four pound rule does not apply to doublewalled tanks

Complete section below

1. Is four pound rule required? Yes ☐ No ☒
2. Height to 12" mark from bottom of tank _____ in.
3. Pressure at bottom of tank _____ P.S.I.
4. Pressure at top of tank _____ P.S.I.

19. TANK MEASUREMENTS FOR TSTT ASSEMBLY

Bottom of tank to grade" 121 in.
 Add 30" for "T" probe assy. 30 30 in.
 Total tubing to assemble — approximate 151 in.

20. EXTENSION HOSE SETTING

Tank top to grade" 57 in.
 Extend hose on suction tube 6" or more
 below tank top _____ in.

"If Fill pipe extends above grade, use top of fill.

22. Thermal-Sensor reading after circulation _____ digits
 _____ °F
 Between
 23. Digits per °F in range of expected change _____ digits

COEFFICIENT OF EXPANSION (Complete after circulation)

24a. Corrected A.P.I. Gravity
 Observed A.P.I. Gravity _____
 Hydrometer employed _____ H
 Observed Sample Temperature _____ °F
 Corrected A.P.I. Gravity @ 60°F. From Table A. _____
 Coefficient of Expansion for Involved Product From Table B. _____
 Transfer COE to Line 25b.

21. VAPOR RECOVERY SYSTEM ☐ Stage I ☐ Stage II

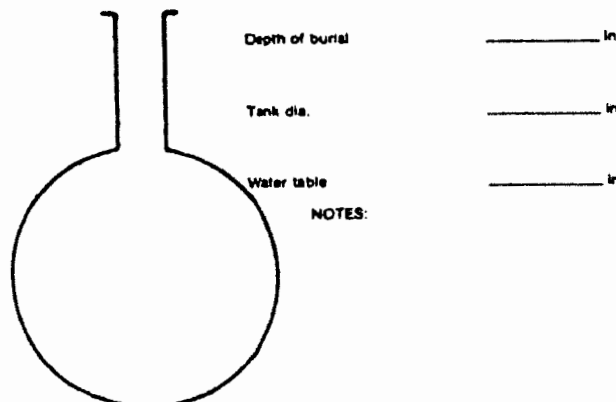
24b. COEFFICIENT OF EXPANSION RECIPROCAL METHOD

Type of Product Water
 Hydrometer Employed _____ H
 Temperature in Tank After Circulation _____ °F
 Temperature of Sample _____ °F
 Difference (+/-) _____ °F
 Observed A.P.I. Gravity _____
 Reciprocal _____ Page # _____
 Total quantity in full tank (16 or 17) _____ Reciprocal _____ Volume change in this tank per °F _____
 Transfer to Line 26a.

24c. FOR TESTING WITH WATER see Table C & D

Water Temperature after Circulation Table C 49°
 Coefficient of Water Table D 0.0004554
 Added Surfactant? ☐ Yes ☐ No Transfer COE to Line 25b.

25. (a) 4040 × (b) 0.0004554 = (c) 1.83982 gallons
 Total quantity in full tank (16 or 17) Coefficient of expansion for involved product Volume change in this tank per °F
 26. (a) 1.83982 + 1000 = 1.0002 This is
 Volume change per °F (25 or 24b) Digits per °F in test Volume change per digit



NOTES:

The above calculations are to be used for dry soil conditions to establish a positive pressure advantage, or when using the four pound rule to compensate for the presence of subsurface water in the tank area.

Refer to N.F.P.A. 30, Sections 2-3.2.4 and 2-7.2 and the tank manufacturer regarding allowable system test pressures.

| 27 | | Grade | | 30. HYDROSTATIC PRESSURE CONTROLS | | 31. HIGH LEVEL MEASUREMENTS (H) RECORD NO. 001 CAL | | 34. TEMPERATURE COMPENSATION FOR FUEL FACTOR 100 | | 38. NET FUEL USED CHARGING EACH 15 MIN | | 39. ACCUMULATOR CHARGE | | | |
|-----------------------|-----------------------|----------------------|------------------------|-----------------------------------|---------------|--|------|--|----|--|------|--|--|--|--|
| LOG OF TEST PROCEDURE | | | | Standard Level as marked | | Product as Estimated | | Product Reported 1-1 | | Thermal Sensor Reading | | Temperature Adjustment (H - L) x 1000 (L - H) x 1000 | | Net Low Level Change per Hour (H - L) x 1000 | |
| 28. DATE | 29. RUNNING TIME | Beginning of Reading | Level to which Reduced | Before Reading | After Reading | Product As over all 1-1 | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| 9:30 | | | | | | | | | | | | | | | |
| | Circulate Product | | | | | | | | | | | | | | |
| 10:15 | Start High Level Test | | | 42 | | | | | | | | | | | |
| 10:30 | High Level Test | 1 | 42 | 42 | 380 | 320 | -06 | 250 | 19 | +002 | -062 | | | | |
| 10:45 | | 2 | 42 | 42 | 320 | 280 | -04 | 258 | 18 | +002 | -042 | | | | |
| 11:00 | | 3 | 42 | 42 | 280 | 280 | 00 | 264 | 16 | +001 | -001 | | | | |
| 11:15 | | 4 | 42 | 42 | 280 | 280 | 00 | 276 | 12 | +002 | -002 | | | | |
| 11:30 | | 5 | 42 | 42 | | | | 284 | 8 | +002 | -002 | | | | |
| | | 6 | | | | | | | | | | | | | |
| | | 7 | | | | | | | | | | | | | |
| | | 8 | | | | | | | | | | | | | |
| 11:45 | Drop to Low Level | | | 12 | | | | | | | | | | | |
| 50 | Low Level Test | 1 | 12 | 12 | 250 | 250 | 000 | 310 | 15 | +001 | -001 | -001 | | | |
| 65 | | 2 | 12 | 12 | 250 | 250 | 000 | 314 | 14 | +001 | -001 | -002 | | | |
| 12:00 | | 3 | 12 | 12 | 250 | 255 | +005 | 318 | 14 | +001 | +004 | +002 | | | |
| 05 | | 4 | 12 | 12 | 255 | 255 | 000 | 320 | 12 | 000 | 000 | +002 | | | |
| 10 | | 5 | 12 | 12 | 255 | 255 | 000 | 324 | 14 | +001 | -001 | +001 | | | |
| 15 | | 6 | 12 | 12 | 255 | 255 | 000 | 328 | 14 | +001 | -001 | 000 | | | |
| 20 | | 7 | 12 | 12 | 255 | 260 | +005 | 331 | 13 | +001 | +004 | +004 | | | |
| 25 | | 8 | 12 | 12 | 260 | 260 | 000 | 336 | 15 | +001 | -001 | +003 | | | |
| 30 | | 9 | 12 | 12 | 260 | 260 | 000 | 341 | 15 | +001 | -001 | +002 | | | |
| 35 | | 10 | 12 | 12 | 260 | 260 | 000 | 344 | 13 | +001 | -001 | +001 | | | |
| 40 | | 11 | 12 | 12 | 260 | 260 | 000 | 350 | 16 | +001 | -001 | 000 | | | |
| 45 | | 12 | 12 | 12 | 260 | 260 | 000 | 354 | 14 | +001 | -001 | -001 | | | |
| 50 | | 13 | 12 | 12 | 260 | 265 | +005 | 388 | 14 | +001 | +004 | +003 | | | |
| 55 | | 14 | 12 | 12 | 265 | 265 | 000 | 360 | 12 | 000 | 000 | +003 | | | |
| :00 | | 15 | 12 | 12 | 265 | 265 | 000 | 364 | 14 | +001 | -001 | +002 | | | |
| 05 | | 16 | 12 | 12 | 265 | 265 | 000 | 369 | 15 | +001 | -001 | +001 | | | |
| 10 | | 17 | 12 | 12 | 265 | 265 | 000 | 375 | 16 | +001 | -001 | 000 | | | |
| 15 | | 18 | 12 | 12 | 265 | 270 | +005 | 378 | 13 | +001 | +004 | +004 | | | |
| 20 | | 19 | 12 | 12 | 270 | 270 | 000 | 381 | 13 | +001 | -001 | +003 | | | |
| 25 | | 20 | 12 | 12 | 270 | 270 | 000 | 385 | 14 | +001 | -001 | +002 | | | |
| 30 | | 21 | 12 | 12 | 270 | 270 | 000 | 390 | 15 | +001 | -001 | +001 | | | |
| 35 | | 22 | 12 | 12 | 270 | 270 | 000 | 393 | 13 | +001 | -001 | 000 | | | |
| 40 | | 23 | 12 | 12 | 270 | 270 | 000 | 396 | 13 | +001 | -001 | -001 | | | |
| 45 | | 24 | 12 | 12 | 270 | 270 | 000 | 399 | 13 | +001 | -001 | -002 | | | |
| 50 | | | | | | | | | | | | | | | |
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tank system is light

$$-0.02 \div 2 = -0.01 \text{ G.P.F.}$$

P-T Tank Test Data Chart

Additional Info

1. Net Volume Change at Conclusion of Pressure Test _____ gph
Signature of Tester E. V. Burke Jr.
Date 12/11/00

2. Statement

[] Tank and product handling system has been tested right according to the Precision Test Criteria as established by NFPA publication 329. This is not intended to indicate permission of a test.

On

☒ Tank and product handling system has failed the tank tightness test according to the Precision Tool Criteria as established by NFPA publication 332

It is the responsibility of the owner and/or operator of the system to immediately advise state and local authorities of any implied hazard and the possibility of any reportable pathogen to the environment as a result of the indicated failure of the system. Health Consultants Incorporated does not assume any responsibility or liability for any loss of product to the environment.

Jack Brown/Owner: _____

Date _____

Data Chart for Tank System Tightness Test

petro-tite

TANK TESTER

Petro Supply, Inc.

8677 Cherry Lane, Laurel, MD 20707

(301) 953-3540

SE PRINT

| | | | | | | |
|--|---|----------------------------------|---|------------------|--------------|---|
| 1. OWNER Property <input type="checkbox"/> Tanks <input type="checkbox"/> | Pepco 2nd & Vst S.W. Washington D.C. Name Address Representative Telephone Name Address Representative Telephone | | | | | |
| 2. OPERATOR | Pepco Name Address Telephone | | | | | |
| 3. REASON FOR TEST (Explain Fully) | Regulatory | | | | | |
| 4. WHO REQUESTED TEST AND WHEN | Mike Riley Name Title Company or Affiliation Date Address Telephone | | | | | |
| 5. TANK INVOLVED Use additional lines for manifolded tanks | Identify by Direction | Capacity | Brand/Supplier | Grade | Approx. Age | Steel/Fiberglass |
| | East Side | 4000 | | Water | | Steel |
| | West Side | 4000 | | Water | | Steel |
| | | | | | | |
| | | | | | | |
| 6. INSTALLATION DATA | Location | Cover | Fills | Vents | Siphones | Pumps |
| | | Concrete | 4" | 2" | | |
| | North inside driveway, Rear of station, etc. | Concrete, Black Top, Earth, etc. | Size, Titefill make, Drop tubes, Remote Fills | Size, Manifolded | Which tanks? | Suction, Remote, Make if known |
| 7. UNDERGROUND WATER | Depth to the Water table <u>N/A</u> | | | | | Is the water over the tank? <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 8. FILL-UP ARRANGEMENTS | Tanks to be filled _____ hr. _____ Date Arranged by _____ Name Telephone Extra product to "top off" and run tank tester. How and who to provide? Consider NO Lead <u>Full upon arrival</u> Terminal or other contact for notice or inquiry _____ Company _____ Name Telephone | | | | | |
| 9. CONTRACTOR, MECHANICS, any other contractor involved | Petro Supply, Inc. | | | | | |
| 10. OTHER INFORMATION OR REMARKS | Tanks are double wall steel | | | | | |
| Additional information on any items above. Officials or others to be advised when testing is in progress or completed. Visitors or observers present during test, etc. | | | | | | |
| 11. TEST RESULTS | Tests were made on the above tank systems in accordance with test procedures prescribed for as detailed on attached test charts with results as follows: | | | | | |
| | Tank Identification | Tight | Leakage Indicated | | Date Tested | |
| | East Side | tight | -0.01 G.P.H | | 12/11/00 | |
| | West Side | tight | +0.12 G.P.H | | 12/18/00 | |
| | | | | | | |
| | | | | | | |
| 12. SENSOR CERTIFICATION | NOTE: Petro Supply, Inc. represents that the Precision Test was performed in accordance with applicable laws, regulations and procedures for Precision Testing using the Petro-Tite Testing System. Petro Supply, Inc. makes no representations regarding the condition of the subject tank, or the existence or non-existence of any leakage from the subject tank. Owner is hereby advised that it may wish to obtain or request a retesting of the subject tank, with the consent of appropriate regulatory authorities, prior to taking any action with respect to the tank. | | | | | |
| Date _____ Serial No. of Thermal Sensor _____ | | | | | | |

14. Pepco 2nd + Vst S.W. Washington D.C. 12/18/00
 Name of Supplier, Owner or Dealer Address No. and Street(s) City State Date of Test

15. TANK TO TEST

Tank #2 West Side
 Identity by position

Water
 Brand and Grade

15a. BRIEF DIAGRAM OF TANK FIELD

16. CAPACITY

Nominal Capacity 4000
 Gallons

By most accurate capacity chart available 4000
 Gallons

From

- ☐ Station Chart
☐ Tank Manufacturer's Chart
☐ Company Engineering Data
☐ Charts supplied with
☐ Other

17. FILL-UP FOR TEST

Slick Water Bottom before Fill-up tanks full of water 64"
 to 1/4" Gallons Tank Diameter in

Inventory 64" 4000
25
4025
 Gallons Total Gallons as Reading
 Transfer total to line 25a

18. SPECIAL CONDITIONS AND PROCEDURES TO TEST THIS TANK

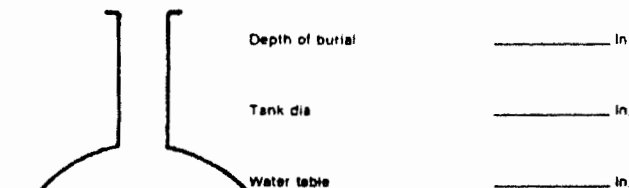
- ☐ Water in tank ☐ Line(s) being tested with LVLLT
☐ High water table in tank excavation

See manual sections applicable Check below and record procedure in log (27).

Use maximum allowable test pressure for all tests
 Four pound rule does not apply to doublewalled tanks

Complete section below

1. Is four pound rule required? Yes ☐ No ☒
 2. Height to 12" mark from bottom of tank _____ in
 3. Pressure at bottom of tank _____ P.S.I.
 4. Pressure at top of tank _____ P.S.I.



NOTES:

The above calculations are to be used for dry soil conditions to establish a positive pressure advantage, or when using the four pound rule to compensate for the presence of subsurface water in the tank area.

Refer to N.F.P.A. 30, Sections 2-3.2.4 and 2-7.2 and the tank manufacturer regarding allowable system test pressures.

19. TANK MEASUREMENTS FOR TSTT ASSEMBLY

Bottom of tank to grade* 147 in
 Add 30" for "T" probe assy. 30 in
 Total tubing to assemble — approximate 177 in

20. EXTENSION HOSE SETTING

Tank top to grade* 85 in
 Extend hose on suction tube 6" or more
 below tank top _____ in

*If fill pipe extends above grade, use top of fill.

22. Thermal-Sensor reading after circulation _____ digits
 _____ °F
 Between _____
 23. Digits per °F in range of expected change _____ digits

COEFFICIENT OF EXPANSION (Complete after circulation)

242. Corrected A.P.I. Gravity
 Observed A.P.I. Gravity _____
 Hydrometer employed _____ H
 Observed Sample Temperature _____ °F
 Corrected A.P.I. Gravity @ 60°F, From Table A _____
 Coefficient of Expansion for Involved Product From Table B _____
 Transfer COE to Line 25b.

21. VAPOR RECOVERY SYSTEM ☐ Stage I ☐ Stage II

24b. COEFFICIENT OF EXPANSION RECIPROCAL METHOD

Type of Product Water
 Hydrometer Employed _____ H
 Temperature in Tank After Circulation _____ °F
 Temperature of Sample 51 °F
 Difference (+/-) _____ °F
 Observed A.P.I. Gravity _____
 Reciprocal _____ Page # _____
 Total quantity in full tank (16 or 17) _____ Reciprocal _____ Volume change in this tank per °F _____
 Transfer to Line 25a.

24c. FOR TESTING WITH WATER see Table C & D

Water Temperature after Circulation 51 °F
 Table C _____
 Coefficient of Water 0.0005298
 Table D _____
 Added Surfactant? ☐ Yes ☐ No Transfer COE to Line 25b.

25. (a) 4025 x (b) 0.0005298 = (c) 2.13245 gallons
 Total quantity in full tank (16 or 17) Coefficient of expansion for involved product Volume change in this tank per °F
 26. (a) 2.132 5 + 1000 = 0.0002
 Volume change per _____ or 24b) Digits per °F in test Range (23) Volume change per digit Compute to 4 decimal places. This test factor (a)

Attachment 6

Cathodic Protection Reports

Piping & Corrosion Specialties, Inc.

8371 Jumpers Hole Rd. Millersville, Maryland 21108
Baltimore (410) 544-3232 ♦ Fax (410) 544-1600 ♦ Toll Free (800)-660-5907
Website: www.pipingandcorrosion.com

May 21, 2009

North American Energy Services
1st & V Street, SW
Washington, DC 20024

Attn: Mike Gnip

Re: Cathodic Protection System Testing
ICCP System – Two (2) 490K Gallon Aboveground Storage Tanks (AST) & Piping
Galvanic Systems – Steel Piping Associated With (2) FRP UST
PEPCO Buzzard Point Power Plant – Washington, DC

Dear Mr. Gnip:

On May 11th, 2009, a Piping & Corrosion Specialties Corrosion Technician completed a cathodic protection system survey at the above referenced location. The testing was performed utilizing the criteria for cathodic protection specified in NACE Standards RP0285-2002 "*Corrosion Control of Underground Storage Tank Systems by Cathodic Protection*" and SP0169-2007 "*Control of External Corrosion on Underground or Submerged Metallic Piping Systems*".

ICCP – Two (2) 490K Gallon AST & Associated Buried Piping

Upon arrival the rectifier was found "on" and operating at a DC output of 17.4 volts and 2.2 amperes. Interrupted structure-to-soil potential measurements were taken at the CP test stations around the ASTs utilizing both the permanent copper-copper sulfate reference electrode leads in the test stations and a portable reference electrode in conjunction with a high impedance voltmeter. The data obtained during the survey indicate that the two (2) ASTs are in compliance with the regulations for external corrosion control. In addition, the potentials measured on the buried piping were indicative of adequate levels of corrosion control. The rectifier DC output was not adjusted as a result of the survey. It shall be noted that test station #1 at Tank "B" could not be located due to overgrown plants. Tabulated field survey data is attached for your reference.

Galvanic CP – Steel Piping Associated with Two (2) FRP UST

Interrupted piping-to-soil potential measurements were taken at specific locations above the piping utilizing the existing test leads and a portable copper-copper sulfate reference electrode in conjunction with a high impedance voltmeter. The data obtained during the survey indicate that the two (2) piping runs are **not** in compliance with Federal and State regulations for external corrosion control. In its present condition, the galvanic anode cathodic protection systems are not providing enough current for effective external corrosion control. Tabulated field survey data, including the total galvanic anode current output, is attached for your reference.

Current requirement testing was performed on the two piping runs until cathodic protection was achieved. Based on the results of the current requirement testing, the buried steel piping can be adequately protected with the installation of supplementary galvanic anodes at the perimeters of the two piping runs. The anodes would be terminated to the pipe test leads in the existing flush-to-grade CP test stations.

Recommendations

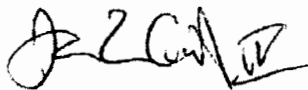
In order to insure that adequate levels of external corrosion control are being achieved on the two (2) buried steel piping runs and to maintain regulatory compliance we recommend the following:

1. Install additional galvanic anodes at the perimeters of the two (2) steel piping runs,
2. Perform post-installation testing of the supplementary systems to verify that the piping is receiving adequate levels of corrosion control per Federal and State regulations.
3. Clear grass and brush at Tank "B" test station #1 to allow for access to the station and to facilitate future surveys.

A quote to perform the supplementary galvanic anode installations and to perform post-installation testing will be sent to you under a separate cover. The CP systems will be designed by a NACE International certified Cathodic Protection Specialist.

Please do not hesitate to call if you have any additional questions.

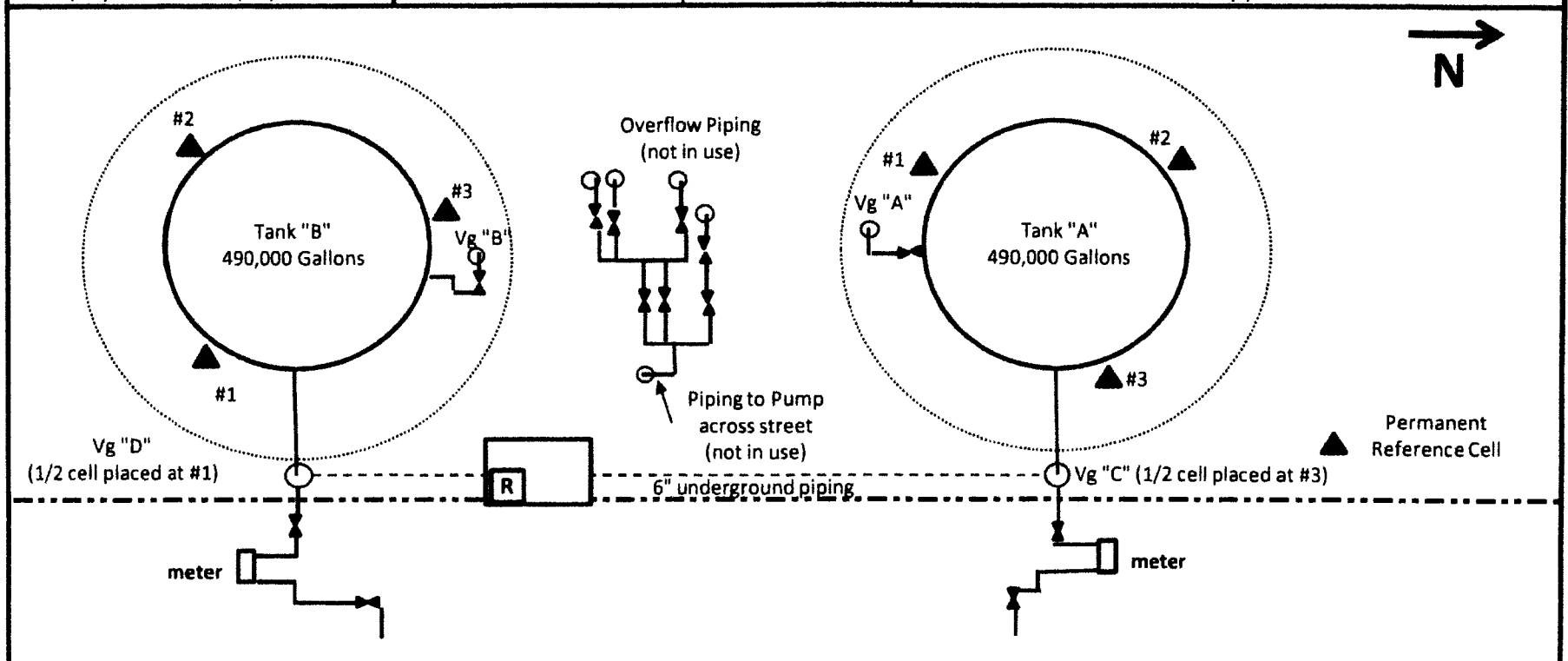
Sincerely,

A handwritten signature in black ink, appearing to read 'J L Quirk IV', with a stylized flourish at the end.

James L. Quirk IV
Cathodic Protection & Integrity Manager

Piping & Corrosion Specialties, Inc.
8371 Jumpers Hole Road
Millersville, Maryland 21108
Phone: (410) 544-3232 Fax: (410) 544-1600

| | | | |
|---|----------------|--|---------------|
| Contractor/ Owner: North American Energy Services | | Data Sheet 1 of 2 | |
| PEPCO Buzzard Point Power Plant - Washington, DC | | Annual ICCP Survey - Two (2) 490K Diesel ASTs & Piping | |
| Test Equipment: Fluke 87 digital multimeter | | | |
| Weather: Cool/Rain | Date: 5/9/2009 | Job#: MA-147 | Tester(s): GD |

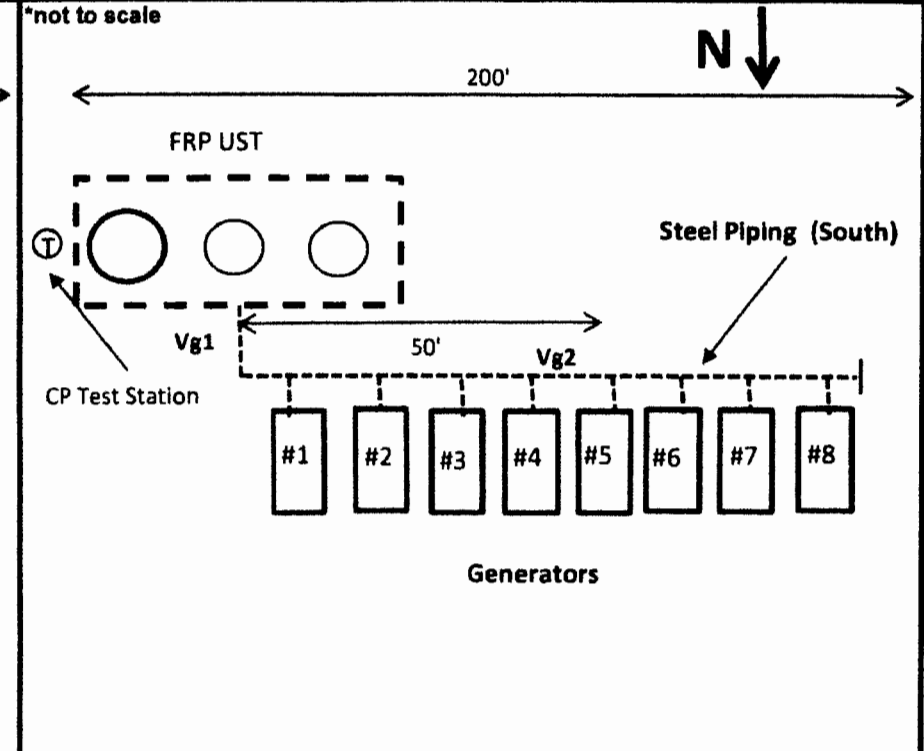
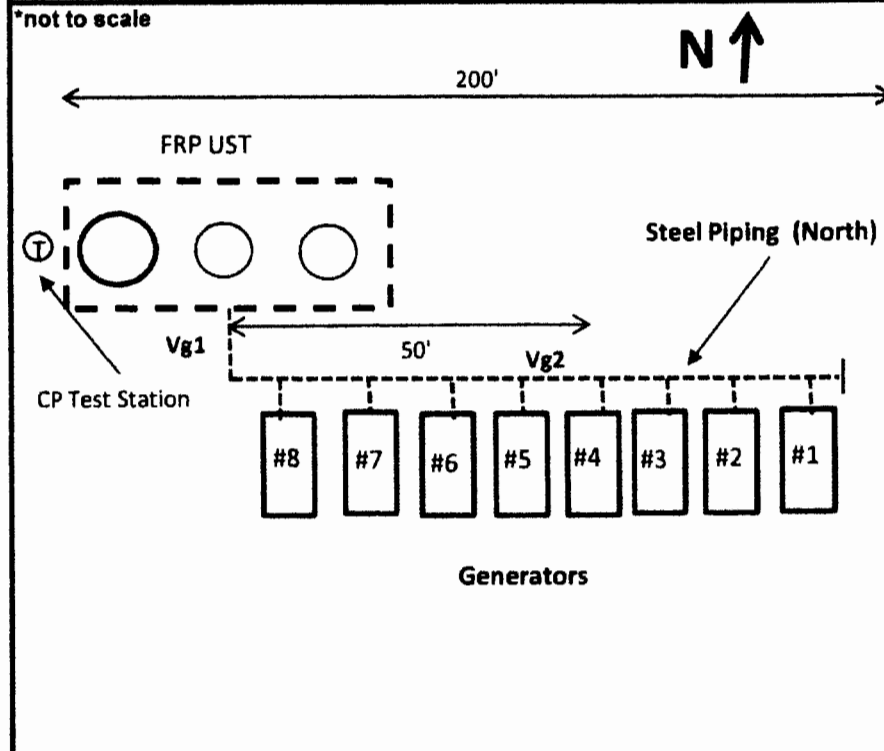


| Units | Volts | Volts | Volts | millivolts | Volts | Volts | | | | |
|-----------------|---------------------------|----------------------------|---------------------------|--------------|--------------------------|---------------------------|--|----------------|----------------------|-----------------|
| Test Location | Vg "ON" Permanent CuCuSO4 | Vg "OFF" Permanent CuCuSO4 | Depolarized Vg (1/2 hour) | Polarization | Vg "ON" Portable CuCuSO4 | Vg "OFF" Portable CuCuSO4 | | Rectifier Data | Rectifier Meters | External Meters |
| Tank "A" | | | | | | | | DC Volts | 16.0 | 17.42 |
| 1 | -3.662 | -0.876 | -0.636 | 240 | -2.584 | -0.965 | | shunt | 50mV=10A | 11.0 mV |
| 2 | -2.104 | -0.771 | -0.619 | 152 | -1.982 | -0.923 | | DC Amps | 2.0 | 2.2 |
| 3 | -2.904 | -0.765 | -0.512 | 253 | -2.234 | -0.913 | | Hour Meter | 00938.7 | --- |
| Piping A | --- | --- | --- | --- | -1.475 | -0.885 | | | | |
| Tank "B" | | | | | | | | Model # | Goodall SSAYSA 80-8R | |
| 1 | missing TS | missing TS | --- | --- | -1.412 | -0.871 | | Serial # | 88X1651 | |
| 2 | -1.615 | -0.822 | -0.675 | 147 | -1.475 | -0.879 | | DC Rating | 80V / 8A | |
| 3 | -1.685 | -0.751 | -0.596 | 155 | -1.642 | -0.861 | | AC Rating | 115V / 8.4A | |
| Piping B | --- | --- | --- | --- | -1.405 | -0.862 | | | | |
| Piping C (6") | --- | --- | --- | --- | -2.141 | -0.853 | | | | |
| Piping D (6") | --- | --- | --- | --- | -1.348 | -0.861 | | | | |

Piping & Corrosion Specialties, Inc.
 8371 Jumpers Hole Road
 Millersville, Maryland 21108
 Phone: (410) 544-3232 Fax: (410) 544-1600

Contractor/ Owner: North American Energy Services
 PEPCO Buzzard Point Power Plant - Washington, DC Annual Galvanic Survey - Steel Piping for (2) FRP UST
 Test Equipment: Fluke 87 digital multimeter
 Weather Cool/Rain Date: 5/9/2009 Job#: MA-147 Tester(s): GD

Data Sheet 2 of 2



| Units | Volts | Volts | milliamps | | Volts | Volts | milliamps | | | | |
|---------------|---------|------------------|----------------------|--|------------------------------------|------------------|--------------------------|--|--|--|--|
| Test Location | Vg "ON" | Vg "Instant-Off" | Anode Output (total) | | Vg "ON" | Vg "Instant-Off" | Anode Output (temporary) | | | | |
| North | | | 2.25 | | Current Requirement Testing | | | | | | |
| 1 | -0.862 | -0.649 | | | | | | | | | |
| 2 (@ 50') | -0.825 | -0.622 | | | -6.898 | -1.361 | 36 | | | | |
| | | | | | | | | | | | |
| South | | | 6.35 | | | | | | | | |
| 1 | -0.656 | -0.476 | | | | | | | | | |
| 2 (@ 50') | -0.617 | -0.438 | | | -2.945 | -0.859 | 115 | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

Notes:

1) Potentials measured to portable CuCuSO4 reference cell.

PIPING & CORROSION SPECIALTIES INC.

P.O. BOX 10 • PASADENA, MARYLAND 21123
BALTIMORE (410) 544-3232 • FAX (410) 544-1600 • WASHINGTON METRO (301) 261-1590
April 21, 2003

Mirant Mid Atlantic LLC
3400 Benning Road NE
Washington DC 20019

Attn: Mike Reilly

Re: Annual Corrosion Survey
(2) Above Ground & (2) Underground Storage Tank Piping
Buzzard Point Power Plant
Washington DC

Gentlemen:

We have completed testing the (2) cathodic protection systems referenced above. The results of our tests are as follows.

Item 1 - (2) Above Ground Storage Tanks

Potential measurements were taken to the permanent reference electrodes around the tanks. We then connected a circuit interrupter at the rectifier. Then we measured the instant off potential readings. All of the off readings are above the 100mv-polarization shift required to assure cathodic protection. See the attached data sheet with the readings.

Item 2 - (2) Underground Storage Tank Piping

Potential measurements were taken with a portable copper/copper sulfate reference electrode at test stations and above piping. The readings meet the $-0.85V$ criterion established by NACE to assure cathodic protection

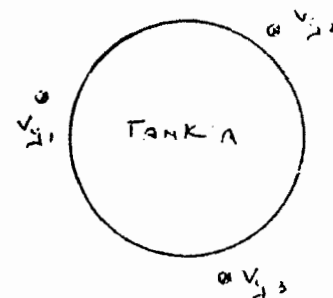
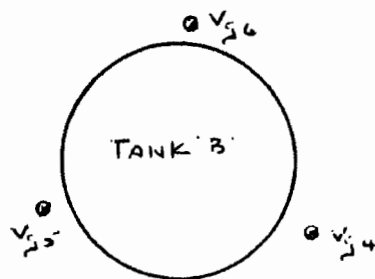
Please call if you have any questions.

Very truly yours,


Guy J. Denney

GJD:ba
attachments

| | | | | | | |
|--|---------------|---------------|----------------------|---|----|---|
| Contractor/ Owner: MIRANT Mid ATLANTIC LLC | | | Data Sheet | 1 | of | 1 |
| Location: BUZZARD POINT POWER PLANT - Wash, DC | | | | | | |
| RE: ANNUAL CORROSION SURVEY (2) A/C + (2) L/C FUEL STORAGE TANKS | | | | | | |
| Contract: | Date: 1-15-02 | Job#: MIA-147 | Tester(s): C. DENNEN | | | |

12. ~~_____~~[illegible]

Piping & Corrosion Specialties, Inc.

8371 Jumpers Hole Rd. Millersville, Maryland 21108
Baltimore (410) 544-3232 ♦ Fax (410) 544-1600 ♦ Toll Free (800)-660-5907
Website: www.pipingandcorrosion.com

July 16, 2009

North American Energy Services
1st & V Street, SW
Washington, DC 20024

Attn: Mike Gnip

Re: Post Installation Testing Report
Galvanic CP – Steel Piping Associated With (2) FRP Underground Storage Tanks
PEPCO Buzzard Point Power Plant – Washington, DC

Dear Mr. Gnip:

On July 15th, 2009, a Piping & Corrosion Specialties Corrosion Technician completed post-installation testing of the cathodic protection systems at the above referenced location. This testing was performed after supplementary galvanic cathodic protection systems were installed based on our quote to you dated May 29th, 2009. The testing was completed utilizing the criteria for cathodic protection stated in NACE Standard SP0169-2007 "*Control of External Corrosion on Underground or Submerged Metallic Piping Systems*".

System Configurations

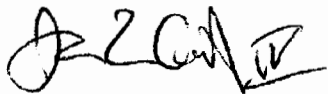
The galvanic systems consist of seven (7) 20# HP magnesium anodes (west side) and three (3) 20# HP magnesium anodes (east side) installed horizontally on 3' centers in the gravel adjacent to the steel drip piping runs. The piping is located between the FRP underground storage tanks (UST) and the generators. The anodes are spliced to a #10 HMWPE anode header cable (+). The anode header cable is installed in a trench in the gravel and the wire is terminated to the piping structure leads inside the existing CP test stations at each location. The anode header cables are installed in 3/4" galvanized conduit attached to the concrete pads over the two (2) FRP underground storage tanks.

Discussion & Conclusions

Interrupted piping-to-soil measurements was taken at a specific locations above the steel drip piping at both locations between the USTs and the generators utilizing the existing pipe testing leads and a portable copper-copper sulfate reference electrode in conjunction with a high impedance voltmeter. The data obtained during this testing indicate that the systems are operating as designed and the steel piping runs located on the west and east sides of the facility are **now** in compliance with Federal and State regulations for external corrosion control. Tabulated field survey data, as well as an as-built sketch of the CP installations, are attached for your reference.

Please do not hesitate to call us if you have any additional questions.

Sincerely,

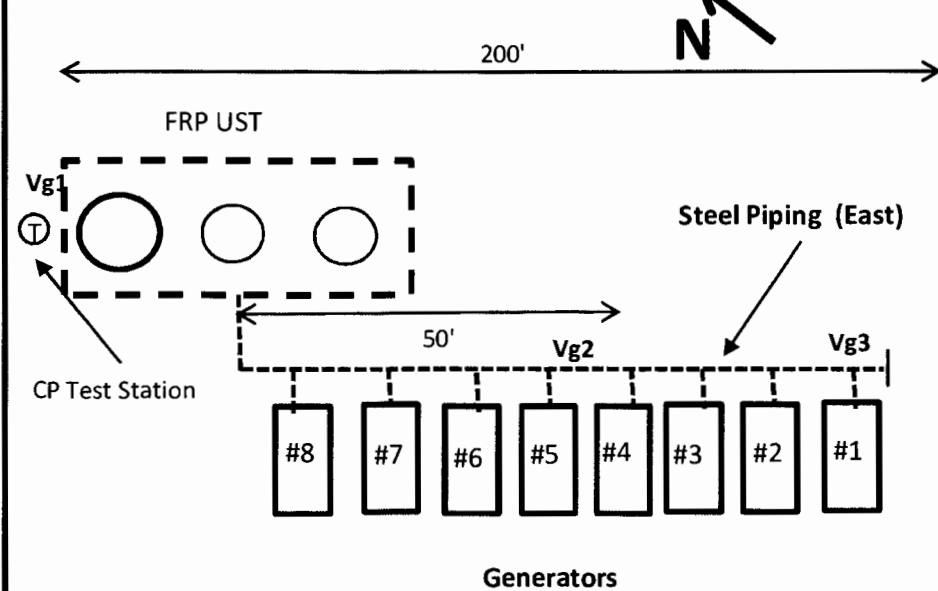
A handwritten signature in black ink, appearing to read "JL Quirk IV". The signature is stylized with a large initial "J" and "L", and the last name "Quirk" followed by "IV".

James L. Quirk IV
Cathodic Protection & Integrity Manager

8371 Jumpers Hole Road
 Millersville, Maryland 21108
 Phone: (410) 544-3232 Fax: (410) 544-1600

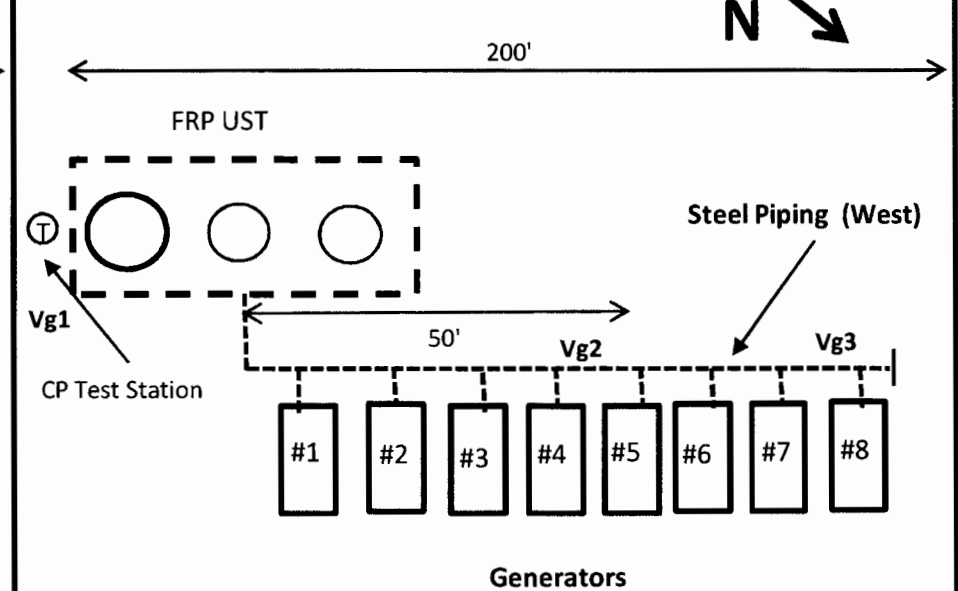
PEPCO Buzzard Point Power Plant - Washington, DC Post Install Testing Galvanic CP - Steel Piping for (2) FRP UST
 Test Equipment: Fluke 87 digital multimeter
 Weather Hot/Dry Date: 7/15/2009 Job#: MA-147 Tester(s): RS

*not to scale



*Note: Piping locations approximate.

*not to scale

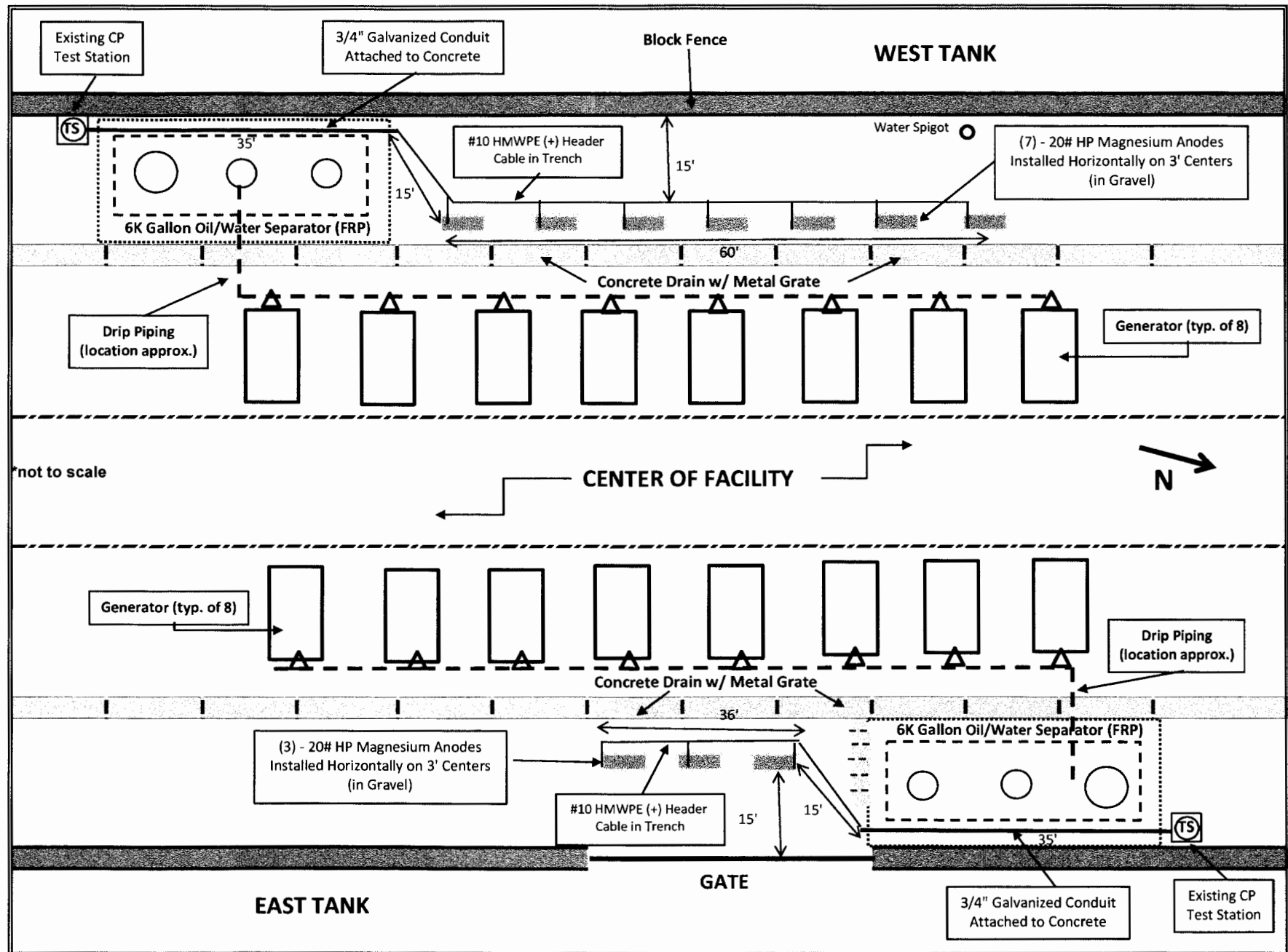


| Units | Volts | Volts | milliamps | | | Volts | Volts | milliamps | | | |
|---------------|---------|------------------|-------------------------|--|-------------|---------|------------------|-------------------------|--|--|--|
| Test Location | Vg "ON" | Vg "Instant-Off" | Anode Output (total) | | | Vg "ON" | Vg "Instant-Off" | Anode Output (total) | | | |
| West | | | 60 | | East | | | 10 | | | |
| 1 | -1.558 | -0.944 | (6mV on 0.01 ohm shunt) | | 1 | -1.501 | -0.941 | (1mV on 0.01 ohm shunt) | | | |
| 2 (@ 50') | -1.672 | -1.013 | | | 2 (@ 50') | -1.645 | -0.924 | | | | |
| 3 (@ 100') | -1.651 | -1.093 | | | 3 (@ 100') | -1.652 | -0.965 | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

Notes:

- 1) Potentials measured to portable CuCuSO4 reference cell.
- 2) (7) 20# HP Mag. anodes installed west side / (3) 20# HP mag anodes installed east side - June 2009

PEPCO BUZZARD POINT POWER PLANT - WASHINGTON, DC
 GALVANIC CP SYSTEMS - GENERATOR DRIP PIPING
 AS-BUILT DRAWING



Attachment 7

Proof of Financial Responsibility

ASSOCIATED ELECTRIC & GAS INSURANCE SERVICES LIMITED

Endorsement No. 19

Effective date of Endorsement October 31, 2011

Attached to and forming part of POLICY No. XL5038401P

NAMED INSURED Pepco Holdings, Inc.

It is understood and agreed that this POLICY is hereby amended as indicated. All other terms and conditions of this POLICY remain unchanged.

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

DECLARATIONS

- Item UST1: A. Name of each covered location:
 (See Section 3)
- B. Address of each covered location:
 (See Section 3)
- Item UST2: Policy Number: XL5038401P
- Item UST3: Period of coverage October 31, 2011 to October 31, 2012
- Item UST4: A. Name of Insurer: Associated Electric & Gas Insurance Services Limited
- B. Address of Insurer: One Church Street, P.O. Box HM2455, Hamilton, HMJX BERMUDA
- Item UST5: A. Name of Insured: Pepco Holdings, Inc.
- B. Address of Insured: Washington DC, 20068

INSURING AGREEMENT

1. This Endorsement certifies that the POLICY to which the Endorsement is attached provides liability insurance covering the underground storage tank(s) listed in Section 3 to this Endorsement for taking corrective action and/or compensating third parties for BODILY INJURY and PROPERTY DAMAGE caused by accidental release; in accordance with and subject to the limits of liability, exclusions, conditions, and other terms of the POLICY; arising from operating the underground storage tanks identified Section 3.

The limits of liability of the Insurer's liability are:

\$1,000,000 each OCCURRENCE; and

\$3,000,000 annual aggregate exclusive of legal defense costs, which are subject to a separate limit under the POLICY.

This coverage is provided under POLICY No: XL5038401P

The effective date of said POLICY is October 31, 2011

2. The insurance afforded with respect to such OCCURRENCES is subject to all of the terms and conditions of the POLICY; provided, however, that any provisions inconsistent with subsections (a) through (e) of this Paragraph

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

2 are hereby amended to conform with subsections (a) through (e):

- a. Bankruptcy or insolvency of the INSURED shall not relieve the Insurer of its obligations under the POLICY to which this Endorsement is attached.
- b. The Insurer is liable for the payment of amounts within any deductible applicable to the POLICY to the provider of corrective action or a damaged third-party, with a right of reimbursement by the INSURED for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated under another mechanism or combination of mechanisms as specified in 40 CFR 280.95 - 280.102.
- c. Whenever requested by a Director of an implementing agency, the Insurer agrees to furnish to the Director a signed duplicate original of the POLICY and all endorsements.
- d. Cancellation or any other termination of the insurance by the Insurer except for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the INSURED. Cancellation for nonpayment of premium or misrepresentation by the INSURED will be effective only upon written notice and only after expiration of a minimum of ten (10) days after a copy of such written notice is received by the INSURED.
- e. The insurance covers CLAIMS otherwise covered by the POLICY that are reported to the Insurer within six months of the effective date of cancellation or non-renewal of the POLICY except where the new or renewed POLICY has the same retroactive date or a retroactive date earlier than that of the prior POLICY, and which arise out of any covered OCCURRENCE that commenced after the POLICY retroactive date, if applicable, and prior to such POLICY renewal or termination date. CLAIMS reported during such extended reporting period are subject to the terms, conditions, limits, including Limits of Liability, and exclusions of the POLICY.

| 3. <u>Name Of Covered Location</u> | <u>Address</u> | <u>Number of Tanks</u> |
|------------------------------------|--|------------------------|
| Buzzard Point Generating Station | 1st and V Street, SW Washington, DC 20024 | 2 |
| Benning Generating Station | 3400 Benning Road, NE Washington, DC 20019 | 4 |
| Alabama Avenue Substation | 3302 15th Street, SE Washington, DC 20032 | 1 |
| National Geospatial Intelligence | 4600 Sangamore Road Bethesda, MD 20816 | 1 |
| Forestville Service Center | 8300 Old Marlboro Pike Upper Marlboro, MD 20772 | 6 |
| Brighton Substation | 1300 Brighton Dam Road Brookeville, MD 20833 | 1 |
| Rockville Service Center | 1600 Gaither Road Rockville, MD 20850 | 5 |
| Pleasantville Operations | 2542 Fire Road Egg Harbor Twp., NJ 08234 | 2 |
| Glassboro Operations | 428 Ellis Street Glassboro, NJ 08028 | 2 |
| Winslow Operations | 295 North Grove Street Berlin, NJ 08009 | 2 |
| Bridgeton Operations | 10 Cohansey Street Bridgeton, NJ 08202 | 2 |

UNDERGROUND STORAGE TANK FINANCIAL RESPONSIBILITY ENDORSEMENT

| | | |
|---------------------------------|---|---|
| Cape May Court House Operations | 420 Route 9 North CMCH, NJ 08210 | 2 |
| West Creek | 457 Main Street West Creek, NJ 08092 | 2 |
| Midtown Thermal Control Center | 1825 Atlantic avenue Atlantic City, NJ | 4 |
| Centerville District Office | Route 213 & Route 18 Centerville, MD 21616 | 2 |
| Control Center | 10611 Westlake Drive Rockville, MD 20817 | 3 |

I hereby certify that the wording of this instrument is identical to the wording in 40 CFR 280.97 (b) (1) and that the Insurer is eligible to provide insurance as an excess or surplus lines insurer in one or more States.

AEGIS Insurance Services, Inc.
Authorized Representative of:
Associated Electric & Gas Insurance Services Limited
1 Meadowlands Plaza
East Rutherford, New Jersey 07073



Signature of Authorized Representative

Attachment 8

Inspection Conclusion Data Sheet